IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, DONNA PRICE, JEFFREY SCHOENBERG,

and

COALITION FOR GOOD GOVERNANCE, LAURA DIGGES, WILLIAM DIGGES III, RICARDO DAVIS, AND MEGAN MISSETT,

Plaintiffs,

V.

BRAD RAFFENSPERGER, in his Oficial Capacity as Secretary of State for the State of Georgia and ex officio Member of the Georgia State Election Board, and SARA GHAZAL, DR. JANICE JOHNSTON, EDWARD LINDSEY, AND MATTHEW MASHBURN, in their official capacities as Members of the Georgia State Election Board,

Defendants.

Civil Action No. 1:17-CV-2989-AT

[PROPOSED] PRETRIAL ORDER

1.

There are no motions or other matters pending for consideration by the court except as noted:

Plaintiffs Statement: Plaintiffs' renewed motions for attorneys' fees and costs and for sanctions are pending with the Court. [See Docs. 967, 998.] As Plaintiffs previously explained, they are under tremendous financial stress and hardship with these motions outstanding and with the mounting, enormous costs of this litigation, which will increase significantly with trial. Plaintiffs also intend to file one motion in limine concerning Defendants' planned use of the untimely and otherwise improper MITRE Report. Plaintiffs reserve the right to file additional motions as appropriate and necessary. Plaintiffs also reserve the right to file motions for judicial notice as appropriate in advance of trial.

Defendants' Statement: Defendants, as of December 7, 2023, have filed a consolidated motion *in limine* addressing several issues. The following additional motions or other matters remain pending for consideration by the Court prior to trial: (1) status of legal counsel of Plaintiff Ricardo Davis¹, [Docs. 1718, 1719, 1720, 1721]; (2) joint statement regarding expert disclosures, [Doc. 1716]; and (3)

¹ Defendants understand this issue will be resolved prior to the pretrial conference, in which case it can be removed.

Motion to Intervene, [Docs. 1706, 1711, 1726]. Defendants further state that attorney-fee motions are not relevant to the trial issues before this Court.

2.

All discovery has been completed, unless otherwise noted, and the court will not consider any further motions to compel discovery.

Plaintiffs' Statement: Discovery closed over a year ago. Any discovery sought by Defendants now is untimely. Plaintiffs reserve the right to seek the full scope of discovery on the untimely and improper MITRE Report afforded by the Federal Rules should the Court allow Defendants to introduce it or evidence pertaining to it at trial, which Plaintiffs oppose. Plaintiffs also reserve the right to seek—and use at trial—additional discovery as appropriate and necessary should unforeseen circumstances develop or new information comes to light that a party could not obtain through reasonable diligence previously.

Defendants' Statement: The Parties' joint statement on disclosure of Dr. Halderman's methods remains pending. Having failed to comply with their Rule 26 obligations, Defendants oppose any testimony relying upon these undisclosed methods.

3.

The names of the parties as shown in the caption to this Order and the

capacity in which they appear are correct and complete, and there is no question by any party as to the misjoinder or non-joinder of any parties.

Plaintiffs' Statement: The Curling Plaintiffs' Third Amended Complaint and the Coalition Plaintiffs' First Supplemental Complaint name members of the State Election Board in their official capacities. For the Court's reference, David J. Worley, Rebecca N. Sullivan, Anh Lee, and Seth Harp are no longer members of the State Election Board, and have been replaced by Matthew Mashburn, Sara Tindall Ghazal, Edward Lindsey, and Janice W. Johnston. There are no questions or issues as to the non-joinder of parties for the Court to resolve.

Defendants' Statement: The Parties are properly named in the caption as the Secretary of State and current members of the State Election Board who have been replaced by rule because they are named in their official capacities. Defendants note, however, that questions may arise as to the non-joinder of parties depending upon the scope of relief, if any, ordered following trial.

4.

Unless otherwise noted, there is no question as to the jurisdiction of the court; jurisdiction is based upon the following code sections.

Plaintiffs' Statement: There is no question as to the Court's jurisdiction, which is based on the following statutes:

Curling Plaintiffs' Claims:

- Count III: Violation of Fundamental Right to Vote Under the Due Process
 Clause of the Fourteenth Amendment and of 42 U.S.C. § 1983.
 - o Jurisdictional basis: 28 U.S.C. §§ 1331, 1343, and 2202.
- Count IV: Violation of Fundamental Right to Vote Under the Equal
 Protection Clause of the Fourteenth Amendment and of 42 U.S.C. § 1983.
 - o Jurisdictional basis: 28 U.S.C. §§ 1331, 1343, and 2202.

Coalition Plaintiffs' and Ricardo Davis's Claims

- Count I: Threatened Infringement of the Fundamental Right to Vote in
 Violation of the Fourteenth Amendment's Guarantee of (Substantive) Due
 Process
 - o Jurisdictional basis: 28 U.S.C. §§ 1331, 1343, and 2202.
- Count II: Threatened Infringement of the Fourteenth Amendment's

 Guarantee of Equal Protection
 - o Jurisdictional basis: 28 U.S.C. §§ 1331, 1343, and 2202.

Defendants' Statement: Curling Plaintiffs' and Coalition Plaintiffs' remaining claims are brought under the First and Fourteenth Amendments to the United States Constitution: Counts III and IV of Curling Plaintiffs' Third Amended Complaint, [Doc. 627], and Counts I and II of the Coalition Plaintiffs' First

Supplemental Complaint, [Doc. 628]. Defendants state that this Court lacks jurisdiction over Plaintiffs' claims, in whole or in part, because Plaintiffs lack statutory and constitutional standing to bring their claims and their claims and the relief Plaintiffs seek raises issues of sovereign immunity, state sovereignty interests, and political questions. Defendants intend to raise these issues at trial.

If Plaintiffs have standing and their claims are not barred for sovereign immunity, state sovereignty interests, and as political questions, then, this Court has federal-question jurisdiction over Plaintiffs' claims "arising under the Constitution ... of the United States." 28 U.S.C. § 1331. Defendants are unaware of any claim necessitating invocation of this Court's supplemental jurisdiction under 28 U.S.C. § 1367, and object to any such new claims for similar reasons to those previously addressed in their motion to dismiss. *See* [Doc. 645-1 at 28–33]; [Doc. 751 at 30, n.18 (concerning Curling Plaintiffs' withdrawal of their State law declaratory judgment claim)].

5.

The following individually-named attorneys are hereby designated as lead counsel for the parties:

Curling Plaintiffs:

David D. Cross *Pro Hac Vice*

MORRISON & FOERSTER LLP 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com

Halsey G. Knapp, Jr.
GA Bar No. 425320
Krevolin & Horst, LLC
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Coalition Plaintiffs:²

Bruce P. Brown Georgia Bar No. 064460 BRUCE P. BROWN LAW LLC 1123 Zonolite Rd. NE Suite 6 Atlanta, Georgia 30306 (404) 881-0700

² The Coalition Plaintiffs, as used herein, means Coalition for Good Governance, Laura Digges, William Digges III, and Megan Missett.

Defendants:

Bryan P. Tyson Georgia Bar No. 515411 TAYLOR ENGLISH DUMA LLP 1600 Parkwood Circle, Suite 200 Atlanta, GA 30339 Telephone: 678-336-7249

Vincent Russo Georgia Bar No. 242628 ROBBINS ALLOY BELINFANTE LITTLEFIELD LLC 500 14th Street NW Atlanta, GA 30318 Telephone: 678-701-9381

6.

Normally, the plaintiff is entitled to open and close arguments to the jury. (Refer to LR 39.3(B)(2)(b)). State below the reasons, if any, why the plaintiff should not be permitted to open arguments to the jury.

Plaintiffs' and Defendants' Statement: This case will not be tried before a jury. The parties request the opportunity to present opening and closing arguments to the court, which they believe will assist the court in understanding and resolving the issues to be addressed and decided at trial. The Parties request that equal time be allocated between (1) all Plaintiffs, collectively, and (2) Defendants.

7.
The captioned case shall be tried (_____) to a jury or (__X___) to the court

without a jury, or (_____) the right to trial by jury is disputed.

8.

State whether the parties request that the trial to a jury be bifurcated, i.e. that the same jury consider separately issues such as liability and damages. State briefly the reasons why trial should or should not be bifurcated.

Plaintiffs' and Defendants' Statement: This case will be tried to the court and no bifurcation is requested.

9.

Because this case will be tried to the court, the parties do not request any *voir dire* questions.

10.

Because this case will be tried to the court, the parties do not request any *voir dire* questions.

11.

Because this case will be tried to the court, the parties do not request any *voir dire* questions.

12.

Because this case will be tried to the court, the parties do not request any strikes.

13.

State whether there is any pending related litigation. Describe briefly, including style and civil action number.

Plaintiffs' Statement: There is no pending related litigation.

Defendants' Statement: The following related litigation is presently pending:

VoterGa, et al. v. State of Georgia, No. 2021CV353604 (Fulton Cnty., Ga., Superior Court May 31, 2022) (order granting motion to dismiss), aff'd, 368 Ga. App. 119 (2023), petition for cert. filed, S23C1132 (Ga. July 13, 2023). In this case, VoterGA filed a petition for declaratory and injunctive relief against the State regarding the Dominion BMD System, alleging that "although the paper ballot that is generated from the ballot marking devices displays the elector's written intent on the face of the ballot, the elector is unable to verify whether the corresponding QR code on the paper ballot accurately encodes the elector's voting choices" and, consequently, that the Dominion BMDs failed to comply with O.C.G.A. §§ 21-2-2(7.1) and 21-2-300(a)(2). 368 Ga. App. at 120. The trial court granted the State's motion to dismiss and VoterGA appealed. The Court of Appeals affirmed the trial court's order, finding the BMDs are compliant with Georgia law. Id. at 123. A petition seeking a writ of certiorari from the Georgia Supreme Court was

- filed on July 13, 2023, and remains pending. S23C1132. *See also* [Doc. 1682 (Notice of Supplemental Authority)].
- June 29, 2023), appeal docketed, No. 23-35452 (9th Cir. July 5, 2023). The Thielman plaintiffs filed suit alleging that "Oregon's computerized vote tabulation and mail-in voting systems violate their constitutional rights, including violations of the Due Process Clause, the Equal Protection Clause, and their fundamental right to vote." 2023 WL 4267434 at *1. Plaintiffs sought a judgment declaring that Oregon's voting systems are unconstitutional and enjoining their use. *Id.* The district court dismissed plaintiffs' claims for lack of standing and plaintiffs' appeal remains pending.
- State of Georgia v. Donald J. Trump, et al., No. 23SC188947 (Fulton Cnty., Ga., Superior Court). This criminal case brought by the Fulton County

 District Attorney is pending in the Fulton County Superior Court. Generally, the indictment alleges that former President Donald J. Trump and eighteen co-defendants joined in a conspiracy to unlawfully change the outcome of the 2020 presidential election. While Defendants dispute the relevance of this criminal prosecution, Plaintiffs have engaged in discovery concerning acts alleged in the indictment as part of the conspiracy. Four co-defendants

have entered negotiated please in the matter, including two whose involvement is seemingly focused on Coffee County—Scott Hall and Sidney Powell.

14.

Attached hereto as Attachment "A" is Plaintiffs' outline of the case which includes a succinct factual summary of Plaintiffs' cause of action and which shall be neither argumentative nor recite evidence. All relevant rules, regulations, statutes, ordinances, and illustrative case law creating a specific legal duty relied upon by Plaintiffs shall be listed under a separate heading. In negligence cases, each and every act of negligence relied upon shall be separately listed. For each item of damage claimed, Plaintiffs shall separately provide the following information: (a) a brief description of the item claimed, for example, pain and suffering; (b) the dollar amount claimed; and (c) a citation to the law, rule, regulation, or any decision authorizing a recovery for that particular item of damage. Items of damage not identified in this manner shall not be recoverable. **Plaintiffs' Statement:** In light of the extensive briefing in this case, and the Court's recent summary judgment order, Plaintiffs do not believe an outline is necessary or an appropriate use of limited time and resources as the parties prepare for trial. Plaintiffs are happy to submit an outline at the Court's request.

Attached hereto as Attachment "B" is the State Defendants' outline of the case which includes a succinct factual summary of all general, special, and affirmative defenses relied upon and which shall be neither argumentative nor recite evidence. All relevant rules, regulations, statutes, ordinances, and illustrative case law relied upon as creating a defense shall be listed under a separate heading. For any counterclaim, the State Defendants shall separately provide the following information for each item of damage claimed: (a) a brief description of the item claimed; (b) the dollar amount claimed; and (c) a citation to the law, rule, regulation, or any decision authorizing a recovery for that particular item of damage. Items of damage not identified in this manner shall not be recoverable. **Defendants' Statement**: Defendants request to be permitted the opportunity to file a short, concise, outline of the case or otherwise pretrial brief prior to the beginning of trial (see, infra., \P 21–22). Defendants believe that concise, nonargumentative, statements of law and fact will aid the Court in relating the factual determinations to be resolved at trial with the legal basis for Plaintiffs' requests for relief. Such practice is also standard procedure for trials in this District and has previously been permitted in the context of other voting rights trials in this District.

16.

The parties submit no stipulated facts at this time, but will continue to meet and confer about potential fact stipulations leading up to trial.

17.

The legal issues to be tried are as follows:

By Curling Plaintiffs:

The legal issues to be tried are as follows:

- Count III: Whether Georgia's BMD voting system violates the fundamental right to vote under the Due Process Clause of the 14th Amendment and of 42 U.S.C. § 1983.
- Count IV: Whether Georgia's BMD voting system violates the fundamental right to vote under the Equal Protection Clause of the 14th Amendment and of 42 U.S.C. § 1983.

By Coalition Plaintiffs:

The legal issues to be tried are as follows:

- Count I: Whether Georgia's Dominion BMD system burdens
 Plaintiffs' fundamental right to vote in violation of the First and
 Fourteenth Amendments.
- Count II: Whether Georgia's Dominion BMD System violates

Plaintiffs' equal protection rights under the Fourteenth Amendment.

Defendants' Statement: The legal issues to be tried are as follows:

- Whether Plaintiffs have suffered any particularized, imminent, and concrete injury(ies) so as to confer standing to bring their claims against Defendants, and if so, whether such injury(ies) is/are traceable to and redressable by the Defendants.
- Whether the Coalition for Good Governance has statutory standing to assert a § 1983 action in its own right.
- Whether Plaintiffs' allegations constitute generalized grievances regarding BMD voting systems and election administration and are not actionable burden(s) on the right to vote.
- Curling Plaintiffs' claims:
 - o Count III: Whether use of the Dominion BMD System³ for inperson voting burdens Curling Plaintiffs' fundamental right to vote, contravening the Due Process Clause of the Fourteenth Amendment and, if so, the severity of any such burden.
 - Count IV: Whether use of the Dominion BMD System for inperson voting in Georgia burdens Curling Plaintiffs' fundamental right to vote via unequal and preferential treatment of absentee votes compared to BMD votes, contravening the Equal Protection Clause of the Fourteenth Amendment and, if so, the severity of any such burden.

³ For purposes of Curling Plaintiffs' claims, the Dominion BMD System means "[t]he system described in Georgia's contract with Dominion [which] calls for inprecinct scanners/tabulators for 2D barcodes generated by the BMDs." [Doc. 627 at ¶ 71]; see also id. at ¶¶ 72–74.

• Coalition Plaintiffs' claims:

- O Count I: Whether use of the Dominion BMD System⁴ for inperson voting in Georgia burdens Coalition Plaintiffs' fundamental right to vote, contravening the First and Fourteenth Amendments and, if so, the severity of any such burden.
- Ocount II: Whether use of the Dominion BMD System for inperson voting in Georgia burdens Coalition Plaintiffs' fundamental right to vote via unequal and preferential treatment of absentee votes compared to BMD votes, contravening the Equal Protection Clause of the Fourteenth Amendment and, if so, the severity of any such burden.
- Whether Plaintiffs' allegation that Georgia's BMD voting system burdens
 the right to have votes accurately counted as cast identifies an act or policy
 of Defendants that imposes systemic or otherwise widespread burden(s),
 or burdens that are of a material character and magnitude on Georgians'
 right to vote as established by the First and Fourteenth Amendments to the
 Constitution of the United States.
- Whether in-person voters using the BMD voting system are deprived of equal protection as compared to voters using absentee paper ballots.
- Whether the harm(s) alleged by Plaintiffs, presuming the harm(s) constitute a burden on the right to vote, have been proximately caused by Defendants under color of state law.
- Whether Defendants' important regulatory interests or otherwise compelling and tailored interests are sufficient to justify any burden imposed on Georgia voters due to purported vulnerabilities in the current BMD voting system.

15

⁴ For purposes of Coalition Plaintiffs' claims, the "Dominion BMD System consists of:" the Democracy Suite Election Management System ("EMS"); EMS adjudication; ICX BMDs; ICP Precinct Scanners; and ICC Central-count scanners. [Doc. 628 at ¶ 67].

- Whether Plaintiffs have adequately shown an available remedy which would ameliorate their alleged harm(s).
- If Plaintiffs successfully demonstrate a burden on their rights to vote which outweighs the Defendants' interests, whether the Plaintiffs will suffer a continuing irreparable injury in the absence of an injunction, the lack of an adequate remedy at law, and whether the equities and public interest support issuance of an injunction.

18.

Attached hereto as **Attachment "C-1"** for the Plaintiffs and **Attachment**"C-2" for the State Defendants is a list of all the witnesses and their addresses for each party. The list must designate the witnesses whom the party will have present at trial and those witnesses whom the party may have present at trial. Expert (any witness who might express an opinion under Rule 702), impeachment and rebuttal witnesses whose use as a witness can be reasonably anticipated must be included. Each party shall also attach to the list a reasonable specific summary of the expected testimony of each expert witness.

All of the other parties may rely upon a representation by a designated party that a witness will be present unless notice to the contrary is given ten (10) days prior to trial to allow the other party(s) to subpoena the witness or to obtain the witness' testimony by other means. Witnesses who are not included on the witness list (including expert, impeachment and rebuttal witnesses whose use should have been reasonably anticipated) will not be permitted to testify, unless expressly

authorized by court order based upon a showing that the failure to comply was justified.

Plaintiffs' Statement:

- For the sake of judicial economy and to reduce the burden on witnesses,

 Plaintiffs propose that each witness will be called to the stand to testify
 only once, except for (i) any witness Plaintiffs recall for rebuttal

 purposes; and (ii) any witness Defendants need to recall in their case-inchief due to unforeseeable developments in the trial after the witness

 testified. If the parties identify the same witness, Defendants will conduct
 their full examination of the witness when Plaintiffs call them (as opposed to
 recalling them and needlessly burdening the witness); thus, any examination
 by Defendants of any such witness will not be limited to the scope of any
 initial examination by Plaintiffs (any subsequent examination of any such
 witness by either side will be limited to the scope of the preceding
 examination by the other side).
- Plaintiffs further propose that the offering party provide notice of the
 witnesses it intends to call to the stand no later than 6:00pm ET two
 business days before calling the witness, and that the witnesses identified
 be limited only to those specific witnesses the sponsoring party or parties

realistically and in good faith intend to call at trial on any given trial day. Plaintiffs propose that the parties may change, forgo, or waive this deadline only upon mutual written agreement of all parties and that the parties will be barred from calling a witness not timely disclosed by this deadline absent unforeseeable circumstances. Relying on "good faith" alone rather than binding disclosure requirements and deadlines unfortunately is insufficient to ensure that Defendants do not adopt trial-by-ambush as a litigation strategy, as their pretrial submissions and the parties' meet-and-confers have indicated they seek to do. Defendants have provided a long witness list with an unrealistic number of "may call" witnesses, including witnesses not disclosed or identified timely, or at all, in discovery. Absent substantial narrowing of that list and reasonable notice of the witnesses Defendants realistically and in good faith intend to call on any given trial day at least two business days before they are expected to testify, Plaintiffs would incur the enormous and highly prejudicial expense, burden, and distraction of preparing cross examination outlines and exhibits for numerous witnesses with little notice, many of whom might not ever testify at all.

Finally, Plaintiffs propose that properly disclosed experts who are expected to testify at trial not be sequestered during trial so that they can observe the

proceedings in full, as is standard in federal courts. The showing necessary for the inclusion of an expert under the exception to the general sequestration rule in Fed. R. Evid. 615 has been held to be a minor burden. *Morvant v. Construction* Aggregates Corp., 570 F.2d 626, 630 (6th Cir. 1978) (trial court bound to accept any reasonable, substantiated representation); T.J. Stevenson & Co. v. 81, 193 Bags of Flour, 629 F.2d 338, 384 (5th Cir. 1980) (trial court "probably required" to permit presence of expert). Indeed, the Advisory Committee specifically noted that the third exception—regarding individuals whose "presence shows to be essential to presenting the party's claim or defense"—contemplates "an expert needed to advise counsel in the management of the litigation." Fed. R. Evid. 615, Advisory Committee Notes, 1972 Proposed Rules. The complexity of the case, vastness of the record, and technical nature of Plaintiffs' claims require comprehensive expert testimony at trial. That need is best served by allowing the experts to observe the proceedings in full.

Defendants' Statement:

• Defendants submit that there is no reason to vary from the normal practice in this district of each side putting up its case. Plaintiffs' proposal would further restrict Defendants' ability to move under Rule 52(c) for judgment at the close of Plaintiffs' evidence. This is not a preliminary-injunction

proceeding. This is a trial and Defendants are entitled to put on *their* case at trial, which should proceed in accordance with the rules. Defendants are willing to disclose witnesses in advance to ensure the trial moves smoothly, as has been done in other election cases before this district.

• Defendants request that witnesses other than parties are sequestered during trial pursuant to Fed. R. Evid. 615. Rule 615 requires that, upon a party's request, "the court **must** order witnesses excluded so that they cannot hear other witnesses' testimony." Fed. R. Evid. 615 (emphasis added). An opposing party may overcome this request by that party showing the witness's presence is "essential to presenting the party's claim or defense." *Id.* at (c) (emphasis added). Mere convenience is not a reason to except a witness from sequestration under Fed. R. Evid. 615, and Plaintiffs do not contend, as is required by Fed. R. Evid. 615(c), that their experts' presence is essential to their case. Defendants are willing to discuss, in good faith, exceptions to Fed. R. Evid. 615 for Plaintiffs' experts provided that Plaintiffs can explain their reasoning.

19.

Attached hereto as **Attachment "D-1"** for the Curling Plaintiffs, **Attachment "D-2"** for the Coalition Plaintiffs, and **Attachment "D-3"** for the

State Defendants are the typed lists of all documentary and physical evidence that will be tendered at trial. Learned treatises which are expected to be used at trial shall not be admitted as exhibits. Counsel are required, however, to identify all such treatises under a separate heading on the party's exhibit list.

Each party's exhibits shall be numbered serially, beginning with 1, and without the inclusion of any alphabetical or numerical subparts. Adequate space must be left on the left margin of each party's exhibit list for court stamping purposes. A courtesy copy of each party's list must be submitted for use by the judge.

Prior to trial, counsel shall mark the exhibits as numbered on the attached lists by affixing numbered yellow stickers to Plaintiffs' exhibits, numbered blue stickers to State Defendants' exhibits, and numbered white stickers to joint exhibits. When there are multiple plaintiffs or defendants, the surname of the particular plaintiff or defendant shall be shown above the number on the stickers for that party's exhibits.

Specific objections to another party's exhibits must be typed on a separate page and must be attached to the exhibit list of the party against whom the objections are raised. Objections as to authenticity, privilege, competency, and, to the extent possible, relevancy of the exhibits shall be included. Any listed

document to which an objection is not raised shall be deemed to have been stipulated as to authenticity by the parties and shall be admitted at trial without further proof of authenticity.

Unless otherwise noted, copies rather than originals of documentary evidence may be used at trial. Documentary or physical exhibits may not be submitted by counsel after filing of the pretrial order, except upon consent of all the parties or permission of the court. Exhibits so admitted must be numbered, inspected by counsel, and marked with stickers prior to trial.

Counsel shall familiarize themselves with all exhibits (and the numbering thereof) prior to trial. Counsel will not be afforded time during trial to examine exhibits that are or should have been listed.

Plaintiffs' Statement: To promote judicial economy, Plaintiffs propose the following disclosure schedule for exhibits parties intend to offer at trial:

• No later than 6:00pm ET two business days before the offering party intends to offer any exhibit on direct examination, the offering party shall disclose the exhibits it intends to offer for each such examination, including (i) the corresponding exhibit number from the sponsoring party's exhibit list for each such exhibit and (ii) the full name of the sponsoring witness (from the sponsoring party's witness list) with whom each such exhibit will be

offered at trial.

- No later than 6:00pm ET one business day before the offering party intends to offer any disclosed exhibit, the non-offering party must disclose all objections to those exhibits, except for any unforeseeable objections that arise upon the use or introduction of the exhibits at trial. Such objections shall be limited only to those specific objections on which the objecting party or parties actually intend to seek a ruling from the Court for trial.
- At 7:30pm ET the evening prior to each trial day, the parties shall meet and confer concerning the exhibits intended to be offered at trial the next day and any other issue appropriate for such a meet-and-confer. The parties agree to inform the Court of any outstanding disputes regarding exhibits, designations, counter designations, demonstratives, or any other issue prior to the start of trial each day. The parties agree to meet and confer in good faith to avoid raising any issue with the Court—absent unforeseeable circumstances—without first conferring with the other side on it not later than the parties' regularly-scheduled meet-and-confer the evening before.
- In order to ensure that the parties in fact follow these disclosure rules and do not resort to trial-by-ambush, Plaintiffs propose that the parties may change, forgo, or waive any of these disclosure deadlines only upon mutual written

Defendants' Statement: Defendants reserve the right to supplement or amend their exhibit list as necessary in light of the outstanding discovery in this case. In order to promote judicial economy, Defendants propose the following disclosure schedule for exhibits parties intend to offer at trial, and further notes that the processes outlined by Plaintiffs and Defendants would necessitate the separate presentation of evidence, because they are triggered by direct examination. Only Defendants' proposal ensures the trial runs in an orderly fashion by making clear when direct examination of each witness takes place:

- No later than 6:00pm ET one business days before the offering party intends to offer any exhibit on direct examination, the offering party shall disclose the exhibits it intends to offer for each such examination, including (i) the corresponding exhibit number from the sponsoring party's exhibit list for each such exhibit and (ii) the full name of the sponsoring witness (from the sponsoring party's witness list) with whom each such exhibit will be offered at trial.
- The parties shall meet and confer as necessary concerning the exhibits intended to be offered at trial and any other issue appropriate for such a meet-and-confer. The parties agree to inform the Court of any outstanding

disputes regarding exhibits, designations, counter designations, demonstratives, or any other issue prior to the start of trial each day. The parties agree to meet and confer in good faith to avoid raising any issue with the Court—absent unforeseeable circumstances—without first conferring with the other side on it not later than the parties' regularly-scheduled meet-and-confer the evening before.

Plaintiffs' and Defendants' Statement: The parties agree to the authenticity of the top email in a thread, *i.e.* most recent, (1) sent from an @sos.ga.gov email address, and (2) which bear a Defendants' Bates stamp. Notwithstanding the parties' agreement as to authenticity of such documents, a party using any such document as an exhibit is still required to disclose such document in accordance with the disclosure schedule adopted by the Court. This is not an agreement to the admissibility of exhibits at trial, and the parties do not waive any objections to such exhibits.

20.

Attached hereto as **Attachment "E-1"** for the Plaintiffs and **Attachment** "**E-2"** for the Defendants are the designations, counter-designations, and objections to the testimony of the witnesses which may be introduced by deposition.

Plaintiffs' and Defendants' Statement: In order to promote judicial economy, the parties propose that, in lieu of playing any deposition designation live in Court, a party may choose to submit any designation to the Court (upon resolution of any evidentiary objections to any such designation) as both an excerpted transcript and a corresponding excerpted video file, if a video file exists; the court then could review the video at its convenience rather than consume trial hours for that.

Plaintiffs' Statement: For the sake of judicial economy, Plaintiffs propose the following disclosure schedule for deposition testimony parties intend to offer at trial:

- No later than 6:00pm ET two business days before the offering party intends to offer any designated testimony, the offering party shall disclose the designated testimony it intends to offer; these shall be limited only to those specific designations the sponsoring party or parties actually intend to offer at trial.
- No later than 6:00pm ET one business day before the offering party intends to offer any designated testimony, the non-offering party must disclose all objections and counter-designations to that testimony; these shall be limited only to those specific (i) counter-designations the sponsoring party or parties actually intend to offer at trial and (ii) objection on which the

objecting party actually intends to seek a ruling from the Court for trial.

• At 7:30pm ET the evening prior to each trial day, the parties shall meet and confer concerning the designations and counter designations intended to be offered at trial the next day and any other issue appropriate for such a meet-and-confer. The parties agree to inform the Court of any outstanding disputes regarding exhibits, designations, counter designations, demonstratives, or any other issue prior to the start of trial each day. The parties agree to meet and confer in good faith to avoid raising any issue with the Court—absent unforeseeable circumstances—without first conferring with the other side on it not later than the parties' regularly-scheduled meet-and-confer the evening before.

In order to ensure that the parties in fact follow these disclosure rules and do not resort to trial by ambush, Plaintiffs further propose that the parties may change, forgo, or waive any of these disclosure deadlines only upon mutual written agreement of all parties or by order of the court on a showing of good cause.

Defendants' Statement: Defendants disagree with Plaintiffs' proposal regarding waiving the disclosure deadlines only by mutual written agreement or order of the court. Defendants propose that the parties make a good faith effort to meet the disclosure deadlines, and in the event a deadline cannot be met, the deadline may

be waived with notice to the opposing party and an explanation of the good faith attempt to meet the deadline.

21.

Plaintiffs' Statement: In light of the extensive briefing in this case, and the Court's recent summary judgment order, Plaintiffs do not believe trial briefs are necessary or an appropriate use of limited time and resources as the parties prepare for trial.

Defendants' Statement: In light of the complexity of the issues involved in this case, Defendants believe a trial brief containing citations to legal authority concerning evidentiary questions and any other legal issues which counsel anticipate will arise during the trial of the case would assist the Court as to such issues should they arise and promote a clear record in the case. Defendants propose that trial briefs be due seven (7) days after the Court enters the pre-trial order.

22.

Because this case will not be tried to a jury, the parties do not intend to submit requests for charge.

23.

Because this case will not be tried to a jury, the parties are not proposing a special verdict form.

24.

Unless otherwise authorized by the court, arguments in all jury cases shall be limited to one-half hour for each side. Should any party desire any additional time for argument, the request should be noted (and explained) herein.

Plaintiffs' and Defendants' Statement: The parties agree that the complexity of the issues involved in this case, combined with the novel legal theories at issue, warrant extending the typical time for opening and closing argument. The parties propose extending the time for opening argument from thirty (30) minutes per side to sixty (60) minutes per side. The parties agree to equal time limits for closing arguments for each side, but propose that the parties wait to meet and confer to agree on a time limit for closing arguments as trial progresses.

25.

If the case is designated for trial to the court without a jury, counsel are directed to submit proposed finding of fact and conclusions of law.

Plaintiffs' and Defendants' Statement: The parties request that proposed findings of fact and conclusions of law be submitted at a date specified by the Court after the conclusion of trial to allow for citation to admitted evidence and testimony.

Pursuant to LR 16.3, lead counsel and persons possessing settlement authority to bind the parties met in person on the following dates: August 10-11, 2023, to discuss in good faith the possibility of settlement of this case. The parties are planning to discuss settlement further on December 13, 2023. The Court has discussed settlement of this case with counsel. It appears at this time that there is little possibility of settlement.

27.

Plaintiffs estimate that they will require 5-8 full days to present their evidence. Defendants estimate that they will require three days to present their evidence. It is estimated that the total trial time is no more than 12 full days, with the trial to be completed by January 24, 2024. But the parties request that the Court continue to hold its schedule open through January 31, 2024, in case additional time is needed to complete the trial in January rather than risk the need to pause and resume later.

Plaintiffs' Statement: Plaintiffs propose that the parties split the total trial time allotted by the Court evenly between Plaintiffs and Defendants. Plaintiffs further propose that each side's own examinations come out of their total time regardless of whether those occur during their own case or that of the other side. Either the Court or the parties will be responsible for carefully tracking and recording the

either side absent unforeseeable and uncontrollable circumstances. This is standard practice in trials across the country and ensures efficient, prompt, timely completion of trial in accordance with Rule 1 of the Federal Rules of Procedure. There is nothing unique or unusual about this case that warrants departing from this standard, important practice, and doing so inevitably will cause the trial to take longer than needed, thereby wasting limited judicial and party resources and delaying resolution of this case on the merits. Plaintiffs believe that this trial can—and must—be completed by the end of January 2024 barring unforeseeable circumstances beyond the control of the parties or the court.

Defendants' Statement: Defendants disagree that the parties be allowed to split the total trial time allotted by the Court evenly. Due to the complexity of the issues involved in this case, combined with the novel legal theories at issue, Defendants propose that each party be allowed what time they require to present their case, without the inclusion of a clock to track the time. Defendants have been parties in other election cases in the Northern District of Georgia that have gone to trial, and each party was allowed the time they required to present their case without a clock or a requirement to split time evenly.

IT IS HEREBY ORDERED that the above constitutes the pretrial order for the above captioned case submitted by stipulation of the parties or approved by the

Court after conference with the parties.

IT IS FURTHER ORDERED that the foregoing, including the attachments thereto, constitutes the pretrial order in the above captioned case and that it supersedes the pleading which are hereby amended to conform hereto and that this pretrial order shall not be amended except by Order of the Court to prevent manifest injustice. Any attempt to reserve a right to amend or add to any part of the pretrial order after the pretrial order has been filed shall be invalid and of no effect and shall not be binding upon any party or the court, unless specifically authorized in writing by the court.

The Hon. Amy Totenberg
Judge, United States District Court

Each of the undersigned counsel for the parties hereby consents to entry of the foregoing pretrial order, which has been prepared in accordance with the form pretrial order adopted by this Court.

Respectfully submitted this 11th day of December, 2023.

/s/ David D. Cross

David D. Cross (pro hac vice)
Mary G. Kaiser (pro hac vice)
Matthaeus Martino-Weinhardt
(pro hac vice)
Ramsey Fisher (pro hac vice)
Aaron Scheinman (pro hac vice)
Benjamin Campbell (pro hac vice)
Wail Jihadi (pro hac vice)
Oluwasegun Joseph (pro hac vice)
MORRISON & FOERSTER LLP
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/s/ Halsey G. Knapp, Jr.

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GA Bar No. 425320
Adam M. Sparks
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/s/ Christian G. Andreu-von Euw

Christian G. Andreu-von Euw (pro hac vice)
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Counsel for Plaintiffs Donna Curling, Donna Price & Jeffrey Schoenberg

/s/ Bruce P. Brown

Bruce P. Brown Georgia Bar No. 064460 BRUCE P. BROWN LAW LLC 1123 Zonolite Rd. NE Suite 6 Atlanta, Georgia 30306 (404) 881-0700 /s/ Robert A. McGuire, III

Robert A. McGuire, III Admitted Pro Hac Vice (ECF No. 125) ROBERT MCGUIRE LAW FIRM 113 Cherry St. #86685 Seattle, Washington 98104-2205 (253) 267-8530

/s/ Russell T. Abney

Russell T. Abney Georgia Bar No. 000875 WATTS GUERRA, LLP 4 Dominion Drive, Building 3 Suite 100 San Antonio, TX 78257 (404) 670-0355

Counsel for Plaintiff Coalition for Good Governance

/s/ Cary Ichter

Cary Ichter Georgia Bar No. 382515 ICHTER DAVIS LLC 3340 Peachtree Road NE Suite 1530 Atlanta, Georgia 30326 (404) 869-7600

Counsel for Plaintiffs William Digges III, Laura Digges, & Megan Missett

<u>/s/ Vincent Russo</u>

Vincent R. Russo Georgia Bar No. 242628 vrusso@robbinsfirm.com Josh Belinfante Georgia Bar No. 047399 jbelinfante@robbinsfirm.com Carey A. Miller Georgia Bar No. 976240 cmiller@robbinsfirm.com Alexander Denton Georgia Bar No. 660632 adenton@robbinsfirm.com Javier Pico Prats Georgia Bar No. 664717 ipicoprats@robbinsfirm.com Edward A. Bedard Georgia Bar No. 926148 ebedard@robbinsfirm.com Anna Edmondson Georgia Bar No. 289667 aedmondson@robbinsfirm.com ROBBINS ALLOY BELINFANTE LITTLEFIELD LLC 500 14th Street, N.W. Atlanta, Georgia 30318 Telephone: (678) 701-9381

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/s/ Bryan P. Tyson

Bryan P. Tyson
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Counsel for Defendants

DONNA CURLING, ET AL., Plaintiffs,	
v.	Civil Action No. 1:17-CV-2989-AT
BRAD RAFFENSPERGER, ET AL.,	
Defendants.	

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Adam M. Sparks
Adam M. Sparks

DONNA CURLING, ET AL., Plaintiffs,

v.

Civil Action No. 1:17-CV-2989-AT

BRAD RAFFENSPERGER, ET AL., Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2023, a copy of the foregoing **PROPOSED PRETRIAL ORDER** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Adam M. Sparks
Adam M. Sparks

DONNA CURLING, ET AL., Plaintiffs,

v.

Civil Action No. 1:17-CV-2989-AT

BRAD RAFFENSPERGER, ET AL., Defendants.

ATTACHMENT C-1: PLAINTIFFS' JOINT WITNESS LIST

Plaintiffs identify herein the individual witnesses they will and/or may call for this lawsuit. Plaintiffs reserve the right to modify or supplement this list with reasonable notice to counsel.

NAME	ADDRESS	Status
Dr. Alex Halderman	In care of Morrison & Foerster, LLP	Will call
A summary of Dr.	Attn: David Cross	
Halderman's opinions are	2100 L Street, NW, Suite 900	
found in his declarations,	Washington, DC 20037	
deposition and hearing	(202) 887-1500	
testimony, and expert reports	dcross@mofo.com	
[e.g., Dkts. 1681, 1304-3,		
1635-19, 1635-38].		

NAME	ADDRESS	Status
Donna Curling	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Will call
Donna Price	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Will call
Jeffrey Schoenberg	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Will call
Kevin Skoglund A summary of Dr. Skoglund's opinions are found in his declarations, deposition and hearing testimony, and expert reports [e.g., Dkts. 640-1, 923-3, 943, 1439, 1635-44].	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
Philip Stark A summary of Dr. Stark's opinions are found in his declarations, deposition and hearing testimony, and expert reports [e.g., Dkts. 296, 327-1, 640-1, 680-1, 809-2, 835-1, 891, 1145, 1633-21].	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call

NIABATE	ADDRESS	C4-4
NAME Marilyn Marks	ADDRESS In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Status Will call
Megan Missett	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
Laura Digges	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
William Digges III	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
Richard DeMillo	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Will call
Brad Raffensperger	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	Will call
Dr. Andrew Appel A summary of Dr. Appel's opinions are found in his declarations, deposition testimony, and expert reports [e.g., Dkt. 1569-59, 1304-4].	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Will call

NAME	ADDRESS	Status
NAME Merritt Beaver	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	Status Will call
Gabriel Sterling	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	Will call
Michael Barnes	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	Will call
Wenke Lee	School of Computer Science Georgia Institute of Technology 266 Ferst Dr Atlanta, Georgia 30331	Will call
Ed Lindsey	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	Will call
Frances Watson	Georgia Department of Revenue 1800 Century Blvd NE Atlanta, Georgia 30345	Will call
C. Ryan Germany	Gilbert, Harrell, Sumerford & Martin, PC 675 Ponce de Leon Ave NE Atlanta, Georgia 30308	Will call
Paul Maggio	SullivanStrickler LLC 2660 Peachtree Road NW #13A, Atlanta, Georgia 30305	Will call
Dr. Juan Gilbert	Computer & Information Science & Engineering Department University of Florida 1889 Museum Rd. Gainesville, FL 32611	May Call

NAME	ADDRESS	Status
Dr. Benjamin Adida	VotingWorks 548 Market St., Ste. 53001 San Francisco, CA 94104	May Call
Chris Harvey	Georgia Peace Officers Standards and Training Council 5000 Austell-Powder Springs Road, Suite 280 Austell, Georgia 30106	May call
Jeanne Dufort	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call
Aileen Nakamura	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call
Joy Wasson	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call
Rhonda Martin	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call
Virginia Forney	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	May call

NAME	ADDRESS	Status
Richard Barron	480 John Wesley Dobbs Ave NE Unit 304 Atlanta, Georgia 30312	May call
Greg Freemeyer	SullivanStrickler LLC 2660 Peachtree Road NW #13A, Atlanta, Georgia 30305	May call
Dean Felicetti	SullivanStrickler LLC 2660 Peachtree Road NW #13A, Atlanta, Georgia 30305	May call
David Hamilton	4570 Summerwood Dr. Cumming, Georgia 30041	May call
Joshua Blanchard	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	May call
Robert Sinners	Georgia Secretary of State's Office 214 State Capitol Atlanta, Georgia 30334	May call
Mathew Mashburn	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	May call
Sara Ghazal	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	May call
Dr. Janice Johnston	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	May call
Rebecca Sullivan	Georgia State Election Board 2 MLK Jr. Drive Ste. 802 Floyd West Tower Atlanta, Georgia 30334	May call

NAME	ADDRESS	Status
Any witness identified by any Defendant	N/A	May call

DONNA CURLING, et al.

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

ATTACHMENT C-2: DEFENDANTS' WITNESS LIST

Defendants identify herein the individual witnesses they will and/or may call for this lawsuit. Defendants reserve the right to modify or supplement this list of witnesses based on further discovery of information and the pretrial proceedings in this lawsuit. Defendants further reserve the right to supplement this list with reasonable notice to counsel.

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
Dr. Ben Adida A summary of Dr. Adida's opinions are found in his declarations and hearing testimony.	Please contact through counsel.	Audits; rebuttal expert testimony	Will call
Michael Barnes	Please contact through counsel.	Georgia election system and security; implementation of updates to Dominion BMD system; the BMD voting experience	Will call
Dr. Juan Gilbert A summary of Dr. Gilbert's opinions are found in his declarations, and deposition and hearing testimony.	Please contact through counsel.	Election security; BMD voting systems; HMPBs; audits; rebuttal expert testimony	Will call
Gabriel Sterling	Please contact through counsel.	Allegations and relief sought in this action; audits; procurement and implementation of Dominion BMD system and updates to the Georgia voting system; physical; CISA; Ballot secrecy; recommended layout of voting machines; implementation of Plaintiffs' requested relief	Will call

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
Merritt Beaver	Please contact through counsel.	IT security; Fortalice assessments	May call
Chris Bellew	Please contact through counsel.	Georgia election system and security; implementation of updates to Dominion BMD system; the BMD voting experience	May call
Matthew D. Bernhard	2260 Hayward Street Ann Arbor, Michigan 48109	Enhanced Voting	May call
Nancy Boren	Attn: Elections & Registration Office P.O. Box 1340 Colombus, Georgia 31902	Balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; audits; implementation of the relief Plaintiffs seek	May call
Eric Chaney (or Coffee County Elections Board Representative)	Coffee County Elections & Registration Office 224 W Ashley Street, Douglas, Georgia 31533	Coffee County	May call
Coalition for Good Governance Corporate Representative	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown	Allegations, claims, and relief sought in this action	May call

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
	1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700		
Jack Cobb	Pro V&V 6705 Odyssey Drive, Suite C Huntsville, Alabama 35806	Voting system certification; review of voting equipment	May call
Benjamin Cotton	27427 Montana Highway 83, Bigfork, Montana 59911	Coffee County and work with VoterGA	May call
Alex Cruce	Attn: Courtney Kramer Binnall Law Group 717 King Street, Suite 200 Alexandria, Virginia 22314	Coffee County; ballot secrecy; efforts to investigate security and accuracy of Georgia election system; communications with Marilyn Marks	May call
Donna Curling	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Allegations, claims, and relief sought in this action	May call
Ricardo Davis	Ichter Davis LLC Attn: Cary Ichter 3340 Peachtree Road NE, Suite 1530	Allegations, claims, and relief sought in this action	May call

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
	Atlanta, Georgia 30326		
Laura Digges	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action	May call
William Digges III	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action	May call
Nick Ikonomakis - Dominion Corporate Representative	Attn: J. Matthew Maguire, Jr. 1355 Peachtree St NE #2000 Atlanta, Georgia 30309	Dominion BMD voting system security; Dominion Democracy Suite version 5.17	May call
James Elliott	577 Mulberry Street, Suite 1225 Macon, Georgia 31201	Municipal election administration in Georgia	May call
Joseph Blake Evans	Please contact through counsel.	Secretary of State election administration issues; recommended layout of voting	May call

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
		machines; implementation of relief	
Ryan Germany	Gilbert, Harrell, Sumerford & Martin, PC 675 Ponce de Leon Ave NE Atlanta, Georgia 30308	Ballot secrecy; election administration issues	May call
Scott Hall	Attn: Lynsey Barron Barron Law 1800 Peachtree St. NE, Suite 300 Atlanta, Georgia 30309	Coffee County; efforts to investigate security and accuracy of Georgia election system; communications with Marilyn Marks	May call
Misty Hampton	830 Dennis Harper Road Ambrose, Georgia 31512	Coffee County	May call
Chris Harvey	Georgia Peace Officers Standards and Training Council 5000 Austell- Powder Springs Road, Suite 280 Austell, Georgia 30106	Ballot secrecy; recommended layout of voting machines; election administration	May call
Joseph Kirk	Bartow County Elections Office 1300 Joe Frank Harris Pkwy., Cartersville, Georgia 30120	Elections Administration; Balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment;	May call

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
		audits; implementation of the relief Plaintiffs seek	
Cathleen Latham	95 Banklodge Drive, Douglas, Georgia 31535	Coffee County	May call
Lynn Ledford	Gwinnett County Voter Registration and Elections 455 Grayson Highway, Suite 200 Lawrenceville, GA 30046 678.226.7210	County elections administration; balloting and voting process for in person and absentee voters; election preparations and physical security of election equipment; implementation of the relief Plaintiffs seek	May call
Richard Lysinger	Please contact through counsel.	Secretary of State IT	May call
Marilyn Marks	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action; Coffee County	May call
Matthew Mashburn	Please contact through counsel.	SEB regulations regarding election security and handling of equipment; SEB authority	May call

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
Megan Missett	In care of Bruce P. Brown Law LLC Attn: Bruce P. Brown 1123 Zonolite Rd. NE, Suite 6 Atlanta, Georgia 30306 (404) 881-0700	Allegations, claims, and relief sought in this action	May call
Theresa Payton	Attn: James E. Connelly 271 17 th Street, N.W. Atlanta, Georgia 30363	IT and cyber security	May call
James Persinger	Please contact through counsel.	IT and cyber security; Coffee County equipment	May call
Donna Price	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Allegations, claims, and relief sought in this action	May call
Secretary of State Brad Raffensperger	Please contact through counsel.	Allegations and relief sought in this action	May call
Jil Ridlehoover	50 Maplewood Road, Douglas, Georgia 31535	Coffee County	May call

Proposed Witness	Address	Anticipated Subjects of Testimony	Status
Jeffrey Schoenberg	In care of Morrison & Foerster, LLP Attn: David Cross 2100 L Street, NW, Suite 900 Washington, DC 20037 (202) 887-1500 dcross@mofo.com	Allegations, claims, and relief sought in this action	May call
Blake Voyles	309 North Gaskin Avenue, Douglas, Georgia 31533	Coffee County	May call
Nick Whitney	6303 Cowboys Way Frisco, Texas 75034	GARViS	May call
Any witness identified by any Plaintiff	N/A	N/A	May Call

DONNA CURLING, et al.

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

ATTACHMENT D-1: CURLING PLAINTIFFS' EXHIBIT LIST AND STATE DEFENDANTS' OBJECTIONS THERETO

State Defendants identify herein their objections to the potential trial exhibits Plaintiffs have jointly identified for this lawsuit. State Defendants reserve the right to modify or supplement this list of objections based on further discovery of information and the pretrial proceedings in this lawsuit. State Defendants further reserve the right to supplement this list of objections with reasonable notice to counsel.

PX No.	Document Description	Citation
	Harri Hursti, Diebold TSx Evaluation, Security Alert	
	- May 11, 2006, Critical Security Issues with Diebold	Dkt. 1628-6
1	TSx, BlackBoxVoting.org (May 11, 2006)	
	Ariel J. Feldman, J. Alex Halderman, & Edward W.	
	Felten, "Security Analysis of the Diebold AccuVote-	
	TS Voting Machine," in Proc.	Dkt. 1628-8
	USENIX/ACCURATE Electronic Voting Technology	
2	Workshop (2007)	
	Electronic Voting System Security: Hearing Before	
	the H. Comm. on House Admin., 108th Cong. 99-	Dkt. 1628-9
	113, at 107-09 (2004) (statement of Kathy	
3	Rogers, Ga. Dir. of Election Admin)	
	Presentation titled "The Georgia Voting System,"	
	presented by Merle S.	Dkt. 1628-12
4	King, Kennesaw State University, Center for	
4	Election Systems, dated February 2014	D1 (1(20 1(
5	STATE-DEFENDANTS-00000409	Dkt. 1628-16
<u>6</u> 7	FOIA Aug. 29, 2016 Email Chain	Dkt. 1628-17
/	FOIA Mar. 16-17, 2017 Email Chains	Dkt. 1628-19 Dkt. 548 at
		PDF
8	FedEx Notice of Complaint	pp. 30-31
9	FOIA July 7, 2017 Email Chain	Dkt. 1628-21
10	Notice of Removal	Dkt. 1020-21
11	FOIA Aug. 9, 2017 Email Chain	Dkt. 1628-23
12	State Defs' Response re Spoliation of Evidence	Dkt. 558
12	Frank Bajak, Georgia election server wiped after suit	Dia co
	filed, AP News (Oct.	Dkt. 1628-25
13	26, 2017)	
	Jan. 8, 2020 Decl. of J. Alex Halderman, Ph.D. with	
	Appx. A: Matthew	
	Bernhard et al., Can Voters Detect Malicious	Dkt. 692-3
	Manipulation of Ballot Marking Devices?, Univ. of	
14	Mich. (2020)	
		Dkt. 471-6
	Ledford Dep. Ex. 6 – KSU CES Instructions re	Ledford Dep.
15	GEMS	Ex. 6

PX No.	Document Description	Citation
	•	Oct. 12, 2022
		SOS
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 1 -	30b6
	2022.10.10 Joint Pls.' 7th Am. 30b6 Deposition	(Sterling)
16	Notice to Ga. Sec'y of State's Office	Dep. Ex. 1
		Dkt. 510-7
		PX02 (July
		2019
17	Ex. C - Feb 2018 Fortalice Report	PI Hearing)
		Dkt. 510-5
		(PX01 (July
		2019
18	Ex. A - Oct 2017 Fortalice Report	PI Hearing)
		Mar. 10, 2022
	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 3 -	SOS
1.0	FORTALICE003692 (Aug.	30b6 (Beaver)
19	25, 2020 Draft Technical Assessment (13 pgs))	Dep. Ex. 3
		Feb. 2, 2022
		SOS
		30b6 (Beaver)
	E 1 2 2022 GOG 201 (/D	Dep. Ex. 14
20	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 14 -	Hamilton
20	STATE-DEFENDANTS- 00126614	Dep. Ex. 17
		Feb. 2, 2022 SOS
		30b6 (Beaver) Dep. Ex. 15
	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 15 -	Hamilton
21	STATE-DEFENDANTS- 00126678	Dep. Ex. 8
<u>∠1</u>	SIMIL-DLI LIIDAN 15- 001200/0	Feb. 2, 2022
		SOS
	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 17 -	30b6 (Beaver)
22	STATE-DEFENDANTS- 00182161	Dep. Ex. 17
	July 30, 2019 State Defs.' Response to Court	•
23	Questions Response to Court	Dkt. 556
	Oct. 25, 2019 Brief ISO State Defs.' Motion to	D1
24	Dismiss	Dkt. 645-1

PX No.	Document Description	Citation
	•	Feb. 2, 2022
		SOS
		30b6 (Beaver)
	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 18 -	Dep. Ex. 18
	STATE-DEFENDANTS-	Hamilton
25	00182171 (2020 Rule 590-8.3 Attestation)	Dep. Ex. 23
		(full version at
		Feb. 24, 2022
		SOS
		30b6
	Nov. 23, 2021 State Defs.' Responses to Curling Pls.'	(Sterling)
26	Requests for Admission (Response No. 65)	Dep. Ex. 7
		Dkt. 471-7
		Ledford Dep.
27	Ledford Dep. Ex. 7	Ex. 7
		Feb. 2, 2022
		SOS
	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 16	30b6 (Beaver)
28	STATE-DEFENDANTS- 00153091	Dep. Ex. 16
29	Dominion027284	Dkt. 1630-8
30	STATE-DEFENDANTS-00101382	Dkt. 1630-10
31	STATE-DEFENDANTS-00158640	Dkt. 1630-11
		Feb. 2, 2022
		SOS
	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 29 -	30b6 (Beaver)
32	STATE-DEFENDANTS- 00158823	Dep. Ex. 29
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
		Ex. 4
		PX37 (Sept.
		2020
	F 1 11 2022 GOG 201 (0.5 B)	PI Hearing)
2.2	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 4 -	Gilbert Dep.
33	Dominion001889	Ex. 6

PX No.	Document Description	Citation
		Feb. 11, 2022
		SOS
		30b6 (M.
	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 12 -	Barnes) Dep.
34	STATE- DEFENDANTS-00124842	Ex. 12
		Hamilton
		Dep. Ex.
35	Hamilton Dep. Ex. 18 - FORTALICE001163	18
		Hamilton
	Hamilton Dep. Ex. 14 - STATE-DEFENDANTS-	Dep. Ex.
36	00171971	14
	Hampton Dep. Ex. 22 (still shots captured from	Hampton Dep.
	Misty Hampton YouTube	Ex.
37	video)	22
	Hampton Dep. Ex. 23 (image from the Coffee	Hampton Dep.
	County Elections Office	Ex.
38	produced by Paul Maggio)	23
	Hampton Dep. Ex. 24 (still shot of password on	Hampton Dep.
	paper placed on a desktop	Ex.
39	computer)	24
		Oct. 12, 2022
		SOS
		30b6
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 2 (Sept.	(Sterling)
40	28, 2021 report of Coffee County investigation)	Dep. Ex. 2
	Ex. A to Plaintiffs' Joint Notice of Filing Additional	
	Evidence in Support	Dkt. 1551-1
	of Renewed Motions for Attorneys' Fees and	DR0. 1001 1
41	Expenses	
	Rev.com, Inc., Georgia Secretary of State Brad	
	Raffensperger Press	Dkt. 1630-28
	Conference Transcript: Announces Hand Recount	1000 20
42	(Nov. 11, 2020)	
	Jan. 10, 2019 Secure, Accessible & Fair Elections	D1
, -	(SAFE) Commission	Dkt. 1630-29
43	Report, submitted to the Ga. General Assembly	

PX No.	Document Description	Citation
	Aug. 28, 2019 Joint Discovery Statement Regarding	
	Production of FBI	Dkt. 589
44	Server Image	
	Ga. Sec'y of State, Security-Focused Tech Company,	
	Dominion Voting to	Dkt. 1630-32
	Implement new Verified Paper Ballot System (July	Bittl 1000 02
45	29, 2019)	
46	Intentionally Left Blank	
	Dominion Contract (Cross Decl. Ex. 2 ISO Curling	D1 / (10 0
477	Plaintiffs' Motion for	Dkt. 619-8
47	Preliminary Injunction)	0 / 12 2022
		Oct. 12, 2022
		SOS 30b6
	Oat 12 2022 SOS 20h6 Starling Dan Ev. 4 (typot	
48	Oct. 12, 2022 SOS 30b6 Sterling Dep. Ex. 4 (tweet by Gabriel Sterling)	(Sterling) Dep. Ex. 4
49	Wenke Lee Article (Jan. 3, 2019)	Dkt. 615-3
47	Richard A. DeMillo, Robert S. Kadel & Marilyn R.	DKt. 013-3
	Marks, What Voters are Asked to Verify Affects Ballot	
	Verification: A Quantitative Analysis of Voters'	Dkt. 1630-44
50	Memories of Their Ballots (Apr. 11, 2019)	
	Gilbert Dep. Ex. 2 - University of Georgia School of	
	Public &	Gilbert Dep.
	International Affairs, Georgia Voter Verification	Ex. 2
51	Study (Jan. 22, 2021)	
52	Jan. 7, 2019 Experts Letter to SAFE Commission	Dkt. 419-1
53	ELECTIONS 00000143	Dkt. 1630-48
	July 1, 2021 Coalition Plaintiff's Expert Disclosures	
	- Opening Reports, along with excerpt of	
	Supplemental Decl. of Harri Hursti, dated Sept. 1,	Dkt. 1278-1
	2020, and excerpt of Decl. of Philip B. Stark, dated	
54	Sept. 9, 2018	
	Ben Adida Twitter (Oct. 1, 2022) ("my ideal voting	
	model is one where	Dkt. 1630-50
55	voters get to choose BMD or hand marked")	
	Ben Adida Twitter (Feb. 20, 2020) ("RLAs never	D1 + 1 (21 1
5 .0	confirm outcomes on	Dkt. 1631-1
56	their own")	

PX No.	Document Description	Citation
	Verified Voting's Election Day Equipment map,	
	Verified Voting, <i>Election</i>	Dkt. 1631-2
57	Day Equipment (Data from November 2022)	
	Written Testimony of Marian K. Schneider, President	
	of Verified Voting, to Allegheny Cnty. Bd. of	Dkt. 1631-4
	Elections, Public Meeting on Purchase of Voting	DKi. 1031-4
58	Systems (June 7, 2019)	
		Feb. 11, 2022
		SOS
		30b6 (M.
	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 21 -	Barnes) Dep.
59	Dominion044536	Ex. 21
		Feb. 24, 2022
	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 9 -	SOS
	STATE-DEFENDANTS-	30b6
	00172679 (Email re issues with Fulton County Batch	(Sterling)
60	Tally Sheets)	Dep. Ex. 9
		Jan. 24, 2022
		SOS
		30b6
	Jan. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 23 -	(Sterling)
61	Nov. 17, 2021 Kemp Ltr to SEB re 2020 RLA Report	Dep. Ex. 23
		Jan. 28, 2022
		SOS
	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 15 –	30b6 (Harvey)
62	Dominion073354	Dep. Ex. 15
	Dr. Juan Gilbert's Patent No. US 11, 036, 442 B2 for	Dkt. 1220-9
	"Transparent	Gilbert Dep.
63	Interactive Printing Interface"	Ex. 3
		Fulton Cnty
		30b6
		(Gilstrap)
	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 5 – STATE-	Dep. Ex.
64	DEFENDANTS- 00108789	5
		Fulton Cnty
		30b6
	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 6 – STATE-	(Gilstrap)
65	DEFENDANTS- 00110732	Dep. Ex. 6

PX No.	Document Description	Citation
		Jan. 31, 2022
		Fulton Cnty
	E-mail string from Ryan Germany to Frances Watson	30b6 (Barron)
66	and Chris Harvey re Polling Machine Issues	Dep. Ex. 26
67	Dominion043450	Dkt. 1631-14
68	Dominion043452	Dkt. 1631-15
69	Dominion042793	Dkt. 1631-16
70	Dominion043377	Dkt. 1631-17
71	Dominion043484	Dkt. 1631-18
		Feb. 11, 2022
		SOS
		30b6 (M.
	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 16 –	Barnes) Dep.
72	Dominion043437	Ex. 16
		Feb. 11, 2022
		SOS
		30b6 (M.
	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 18 -	Barnes) Dep.
73	STATE- DEFENDANTS-001 04453	Ex. 18
		Feb. 24, 2022
		SOS
	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 5 (State	30b6
	Defs.' objections and responses to Curling Pls.' first	(Sterling)
74	set of interrogatories)	Dep. Ex. 5
		Feb. 24, 2022
		SOS
	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 6 (State	30b6
	Defs.' objections and responses to Curling Pls.'	(Sterling)
75	second set of interrogatories)	Dep. Ex. 6
	Curling Plaintiffs' joint discovery statement	
	regarding State Defendants'	Dkt. 1177
7.0	responses to Curling Plaintiffs' second set of	
76	interrogatories and CISA request	
77	Oct. 21, 2021 State Defs' Response to Revised	Dkt. 1631-26
77	Interrogatories	I.D. D
	I D D E (M 2021 E	J. Barnes Dep.
70	J. Barnes Dep. Ex. 6 - May 2021 Email re	Ex. 6
78	CyberNinjas	Ridlehoover

PX No.	Document Description	Citation
		Dep.
		Ex. 14
70		D1 : 1122
79	State Defendants' Motion to Seal Halderman Report	Dkt. 1132
80	PD1 - Halderman video stills	Dkt. 892-1
81	PX02 - Side-by-side of Ballots from system hack	Dkt. 892-4
82	PX03 - Scanner Results of Photocopied Ballots	Dkt. 892-5
83	STATE-DEFENDANTS-00047579	Dkt. 1635-25
		Oct. 12, 2022
		SOS
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 5 -	30b6
	Interview by Atlanta Press Club with Brad	(Sterling)
84	Raffensperger, Sec'y of State, GA (Feb. 10, 2022)	Dep. Ex. 5
	Ga. Sec'y of State's announcement: Secretary	
	Raffensperger Calls on J.	Dkt. 1631-39
	Alex Halderman to Agree to Release "Secret Report"	DKt. 1031-37
85	and Pre-Election Testimony (Jan. 27, 2022)	
	Jan. 20, 2022 statement of interest explaining the	
	vulnerability disclosure program operated by the	Dkt. 1631-43
86	U.S. Department of Homeland Security	
	Notice by CISA regarding CVD process and its	Dkt. 1314
87	timeline	DKt. 1314
	CISA's 90-day status report updating the Court and	
	the parties on the final	Dkt. 1381
	steps of CISA's coordinated vulnerability disclosure	DKt. 1301
88	process	
	CISA's ICS advisory, U.S. Dep't of Homeland	
	Security, Cybersecurity & Infrastructure Security	
	Agency, Vulnerabilities Affecting Dominion Voting	Dkt. 1631-46
	Systems ImageCast X, ICS Advisory No. ICSA-22-	
89	154-01 (June 3, 2022)	
90	CISA's 30-day report on CISA's CVD process	Dkt. 1343
91	CISA's 60-day status report on CISA's CVD process	Dkt. 1371
92	Wenke Lee Article (Oct. 8, 2018)	Dkt. 615-2
	Nov. 17, 2021 Halderman Dep. Ex. 5 – Aug. 31,	Nov. 17, 2021
	2021 Decl. of J. Alex Halderman, Coomer v. Donald	Nov. 17, 2021 Halderman
	J. Trump for President, No. 2020cv034319 (Dist. Ct.	Dep. Ex. 5
93	Denver Cnty. Colo.)	Dep. Ex. 3

PX No.	Document Description	Citation
	FORTALICE000124 - Apr. 9, 2021 Fortalice	D1-4 1(25 20
94	Technical Assessment	Dkt. 1635-28
		Dkt. 510-6
		PX03 (July
		2019
		PI Hearing)
		Hamilton
95	November 2018 Fortalice Report	Dep. Ex. 4
		Feb. 2, 2022
		SOS
		30b6 (Beaver)
		Dep. Ex. 10
	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 10 -	Hamilton
96	FORTALICE000625	Dep. Ex. 19
		Mar. 10, 2022
		SOS
	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 1 -	30b6 (Beaver)
97	FORTALICE003593	Dep. Ex. 1
		Mar. 10, 2022
		SOS
	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 2 -	30b6 (Beaver)
98	FORTALICE003807	Dep. Ex. 2
	July 14, 2021 email from Meghan Aubry (Fortalice)	Dkt. 1632-9
99	to Adam Sparks	
		Jan. 28, 2022
		SOS
	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 4 –	30b6 (Harvey)
100	STATE-DEFENDANTS- 00101460	Dep. Ex. 4
		Jan. 31, 2022
	L 01 0000 F 1	Fulton Cnty
101	Jan. 31, 2022 Fulton Cnty 30b6 (Barron) Dep. Ex. 25	30b6 (Barron)
101	– STATE DEFENDANTS-00178061	Dep. Ex. 25
		Jan. 28, 2022
	L 20 2022 GOG 201 (/II) } 5 5 5	SOS
100	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 5 -	30b6 (Harvey)
102	STATE-DEFENDANTS- 00101471	Dep. Ex. 5

PX No.	Document Description	Citation
		Feb. 11, 2022
		SOS
	Feb. 11, 2022 SOS 30b6 (M. Barnes) Ex. 7 - STATE-	30b6 (M.
103	DEFENDANTS- 00158505	Barnes) Ex. 7
		Feb. 11, 2022
		SOS
	Feb. 11, 2022 SOS 20b6 (M. Damas) Dan Ev. 22	30b6 (M.
104	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 22 - STATE- DEFENDANTS-00157919	Barnes) Dep. Ex. 22
104	STATE-DEFENDANTS-0015/919 STATE-DEFENDANTS-00161382	EX. 22
103	ELECTIONS 00000330 (Nov. 20, 2020 email sent	
	from Dwight Bower to	
	Richard Barron, Derrick Gilstrap, and Timothy	Dkt. 1632-18
106	Cummings)	
	The White House, <i>Notice on the Continuation of the</i>	
	National Emergency With Respect to Foreign	Dkt. 1632-19
	Interference In or Undermining Public Confidence in	DKt. 1032-19
107	United States Elections (Sept. 7, 2022)	
		Feb. 2, 2022
		SOS
100	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 24 -	30b6 (Beaver)
108	STATE-DEFENDANTS- 00182284	Dep. Ex. 24
		Jan. 28, 2022 SOS
	Jan. 28, 2022 SOS 30b6 (Harvey) Ex. 11 - STATE-	30b6 (Harvey)
109	DEFENDANTS- 00139190	Ex. 11
107	DELENDARIO 00137170	Coffee
		County BOE
		30b6 (Stone)
		Dep. Ex. 14
		Hampton Dep.
		Ex. 3
		Ridlehoover
		Dep. Ex. 16
110	Misty Hampton Messages with Eric Chaney (Full -	Chaney Dep.
110	24 pages total)	Ex. 9

PX No.	Document Description	Citation
		Hampton Dep.
		Ex. 4
		Latham Dep.
		Ex. 6
		Ridlehoover
111	"Text Messages.pdf" produced by Misty Hampton	Dep. Ex. 17
		SullivanStrick
	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 10 -	ler 30b6
	Coffee County Exterior Surveillance Video still shots	(Felicetti)
112	(Jan. 7)	Dep. Ex. 10 -
		SullivanStrick
	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 11 -	ler 30b6
	Coffee County Exterior Surveillance Video still shots	(Felicetti)
113	(Jan. 8)	Dep. Ex. 11
		Chaney Dep.
		Ex. 10
		SullivanStrick
		ler 30b6
		(Felicetti)
		Dep. Ex. 8
	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 8 -	Logan Dep.
114	Maggio 08122022-000034	Ex. 8
		SullivanStrick
		ler 30b6
44.5	SullivanStrickler - Log of IP addresses that have	(Felicetti)
115	downloaded CC Data	Dep. Ex. 17
	Minute Sheet for proceedings held in Open Court,	
	Pearson et. al v. Kemp	Dkt. 1632-30
116	et al, No. 1:20-cv-04809-TCB (N.D. Ga. Dec. 7,	
116	2020)	C-ff-
		Coffee
	Coffee County BOE 20h6 (Stone) Don Ey 7	County
	Coffee County BOE 30b6 (Stone) Dep. Ex. 7 –	BOE 30b6
117	Coffee County Surveillance Video still shots of	(Stone) Dep. Ex. 7
117	Jeffrey Lenberg (Jan. 27-29) Coffoo County POE 30h6 (Stone) Don. Ey. 8	EX. /
	Coffee County BOE 30b6 (Stone) Dep. Ex. 8 - Coffee County Surveillance Video still shots of	Coffee
110	<u> </u>	County BOE
118	Jeffrey Lenberg & Doug Logan (Jan. 18-19)	·

PX No.	Document Description	Citation
	-	30b6 (Stone)
		Dep. Ex. 8
	Lanhara Dan Ev. 5 (Coffee County ICC & ICD	Lanhara Dan
119	Lenberg Dep. Ex. 5 (Coffee County ICC & ICP Reports)	Lenberg Dep. Ex. 5
117	Lenberg Dep. Ex. 10 (Misty Hampton preparing	Lenberg Dep.
	thumb drive for Jeffrey	Ex.
120	Lenberg)	10
	Jan. 7, 2023 Halderman Supplemental Decl. re	Dkt. 1635-38
121	Coffee County	DKt. 1033-36
		Oct. 12, 2022
		SOS
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 21	30b6
122	(email chain, dated July 27, 2022, between Bruce Brown and Josh Belifante)	(Sterling)
122	Brown and Josh Bernance)	Dep. Ex. 21 Oct. 12, 2022
		SOS
		30b6
		(Sterling)
		Dep. Ex. 18
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 18	Hampton Dep.
123	(Mike Lindell Flight)	Ex. 11
		Coffee
	Coffee County BOE 30b6 (Stone) Dep. Ex. 16 (Feb.	County BOE
124	25, 2021 letter from Jil Ridlehoover to Coffee	30b6 (Stone)
124	County BOE)	Dep. Ex. 16 Coffee
	Coffee County BOE 30b6 (Stone) Dep. Ex. 17 (Feb.	County BOE
	25, 2021 letter from Misty Hampton to Coffee	30b6 (Stone)
125	County BOE)	Dep. Ex. 17
	Excerpt of Ed Voyles production file, which contains	
	a Feb. 24, 2021 text	Dkt. 1632-42
	message thread between Ed Voyles and Misty	DKI. 1032-72
126	Hampton	
105	FORTALICE001658 - Feb. 26, 2021 Evidence	Dkt. 1635-39
127	Collection Protocol	

PX No.	Document Description	Citation
	Ga. Sec'y of State, Raffensperger to Replace Coffee	
	County Election Equipment, End Distraction for	Dkt. 1632-45
128	Local Election Officials (Sept. 23, 2022)	
	Sept. 23, 2022 State Defendants Notice Regarding	
	Coffee County	Dkt. 1492
129	Equipment	
130	Coffee County Acceptance Testing Documents	Dkt. 1377-4
131	Intentionally Left Blank	
	Email thread from Sept. 26, 2022 between David	
	Cross, Bruce Brown, and	Dkt. 1632-50
132	Bryan Tyson	
	Jan. 16, 2023 Email from B. Tyson to R. Abney and	Dkt. 1633-2
133	C. Middleton	
		Oct. 12, 2022
		SOS
		30b6
101	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 8 -	(Sterling)
134	Letter to GBI	Dep. Ex. 8
135	State Defendant's Brief re Investigative Privilege	Dkt. 1427
		Oct. 12, 2022
		SOS
	O + 12 2022 GOG 201 ((G+ 1') D F 11	30b6
126	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 11 -	(Sterling)
136	SOS-INV000048	Dep. Ex. 11
		Oct. 12, 2022 SOS
		30b6
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 13 -	(Sterling)
137	SOS-INV000060	Dep. Ex. 13
131	505 111000000	Oct. 12, 2022
		SOS SOS
		30b6
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 14 -	(Sterling)
138	SOS-INV000014	Dep. Ex. 14
139	SOS-INV000041	Dkt. 1635-41
		Oct. 12, 2022
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 17	SOS
140	(Coffee County surveillance video still shots)	30b6

PX No.	Document Description	Citation
		(Sterling) Dep. Ex. 17
141	SOS, Logan and Lenberg's surveillance video still shots	Dkt. 1489-11
142	Sinners Dep. Ex. 5 - Harry MacDougald's 45-minute call with Marilyn Marks	Sinners Dep. Ex. 5
143	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 29 - STATE-DEFENDANTS- 00101937 (Dominion Notice to Counties)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 29
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 3	Oct. 12, 2022 SOS 30b6 (Sterling)
144	(password on post-it at the base of a monitor) Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 7 - SOS-	Dep. Ex. 3 Oct. 12, 2022 SOS 30b6 (Sterling)
145	INV000007 11Alive Staff, Questions raised in timeline of state response to Coffee County breach, 11Alive News (Sep. 26, 2022, 1:44 PM)	Dep. Ex. 7 Dkt. 1633-16
147	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 6 - The Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022), YouTube (May 9, 2022)	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 6
148	SOS-INV000144 (SEB case list)	Dkt. 1633-18
149	Ga. Sec'y of State, Secretary Raffensperger Calls on Department of Justice to Investigate Allegation of Fulton County Shredding Applications (Oct. 11, 2021)	Dkt. 1633-29

PX No.	Document Description	Citation
150	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 4 - Université de Genève (UNIGE), How to safeguard democracy? A look back at the last American presidential election. Gabriel Sterling, YouTube (Oct. 4, 2021, uploaded Nov. 25, 2021)	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 4
151	August 2020 State Defs.' Opp. to Curling Pls.' Preliminary Injunction Motion	Dkt. 821
152	ELECTIONS 00000091	Dkt. 1633-43
153	ELECTIONS 00000127	Dkt. 1633-44
154	ELECTIONS_00000194	Dkt. 1633-45
155	ELECTIONS_00000198	Dkt. 1633-46
156	ELECTIONS 00000189	Dkt. 1633-47
	Jan. 21, 2022 Fulton Cnty 30b6 (Gilstrap) Dep. Tr.	Jan. 21, 2022 Fulton Cnty 30b6 (Gilstrap)
157	Ex. 7 - STATE- DEFENDANTS-00169113	Dep. Tr. Ex. 7
158	Coffee County BOE 30b6 (Stone) Dep. Tr. Ex. 3 - Coffee County Surveillance Video Still Shots	Coffee County BOE 30b6 (Stone) Dep. Tr. Ex. 3
159	Updated January 7, 2021 Coffee County Surveillance Video Still Shots	Dkt. 1489-8
160	Ben Adida Twitter (October 2, 2022) (HMPB + 1	Oct. 12, 2022 SOS 30b6 (Sterling)
160	BMD) Southern 2019 Words Lee Brosontation	Dep. Ex. 4
161	September 2018 Wenke Lee Presentation	Dkt. 313-1
1.0	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 19 - Maggio 08122022-000098 (FedEx Shipping	SullivanStrick ler 30b6 (Felicetti)
162	Requests & Labels)	Dep. Ex. 19

PX No.	Document Description	Citation
	Chaney Dep. Ex. 4—STATE-DEFENDANTS	Chaney Dep.
	0020100 (SEB2020-250	Ex. 4
163	Investigation Report)	Ex. 4
	Lindsey Dep. Ex. 6 - The Carter Center, <i>Restoring</i>	
	Confidence in	Lindsey Dep.
	American Elections Panel 3 (April 29, 2022),	Ex. 6
164	YouTube (May 9, 2022)	
	Georgia's 2022 Statewide Risk Limiting Audit	
	Confirms Results _ Georgia	Dkt. 1634-11
165	Secretary of State (Feb. 10, 2023).	
		SullivanStrick
		ler 30b6
	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 12 - All	(Felicetti)
166	Photos - Maggio 08122022-000236 to 265	Dep. Ex. 12
	October 2022 State Defs.' Opp to Coalition Pls.'	
	Emergency Motion for	Dkt. 1517
167	Relief re Protective Order	
168	July 20, 2022 Ryan Germany Email re Interview CC	Dkt. 1440-7
169	February 2021 State Defs.' Brief re Standing	Dkt. 1066
	August 2020 Fulton Cnty Opp. to Curling Pls.'	Dkt. 878
170	Preliminary Injunction Motion	DKt. 070
	November 2019 State Defs.' Reply ISO MTD Pls.'	Dkt. 653
171	Amended Complaints	DKt. 033
	October 2017 Fulton Cnty Defs.' Reply ISO Motion	Dkt. 100
172	to Dismiss	DKt. 100
	June 2022 Ex. A—December 2021 SEB Hearing	
	Transcript-Coffee County	Dkt. 1397-1
173	Portion	
	Andrew W. Appel et. al., Ballot-Marking Devices	
	(BMDs) Cannot Assure	Dkt. 855-3 at
	the Will of the Voters, Election L. J., 20 (Feb. 14,	Ex. B
174	2020)	
175	Fulton Cnty Response to Coalition Pls 2nd RFA	Dkt. 1297-6
176	Email re 2nd follow-up requesting documents	Dkt. 1360-5
177	August 2017 State Defs' Brief ISO MTD	Dkt. 8-1
	September 2022 State Defs.' Notice of Conditional	
	Objection to	Dkt. 1473
178	September 9 Proceeding.	

PX No.	Document Description	Citation
179	Greg Freemyer—Combined Posts	Dkt. 1634-50
180	Dec. 12, 2018 SAFE Commission Tr.	Dkt. 1551-2
		Oct 12
		Sterling
181	SOS-INV000053	30b6 Ex. 9
		Oct 12
		Sterling
182	SOS-INV000087	30b6 Ex. 10
	Monday, 11-16-20 19:24 UTC Message # 155, from	Oct 12
	Hampton, to Voyles,	Sterling
183	Subject: ORR	30b6 Ex. 12
	4-25-22 Printout of Case Sheet for SEB2020-250-	Oct 12
	Coffee	Sterling
184	County Misc	30b6 Ex. 15
		Oct 12
	Coffee County surveillance video interior still shots	Sterling
185	(Jan. 7) - 62 images	30b6 Ex. 16
		Oct 12
		Sterling
186	SOS-INV000103	30b6 Ex. 22
	RollingStone: Pro-Trump Georgia Officials Plotted	Oct 12
	to Swipe Voting Data.	Sterling
187	We Caught Them.	30b6 Ex. 24
		Oct 12
		Sterling
		30b6 Ex. 25
		Mar. 10, 2022
	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 25 -	SOS
100	Chris Harvey SOS Notice to Counties re ORR for	30b6 (Beaver)
188	election software	Dep. Ex. 13
	SOS Press Release: Secretary of State's Office Opens	Oct 12
100	Investigation into	Sterling
189	Coffee County's Handling of Recount	30b6 Ex. 26
		Oct 12
100	10102022 000141	Sterling
190	10102022-000141	30b6 Ex. 27

PX No.	Document Description	Citation
	DOJ Ltr to Karen Fann (President of Arizona State	Oct 12
	Senate) re Maricopa	Sterling
191	County audit and Cyber Ninjas	30b6 Ex. 28
	SOS Press Release: The MITRE Corporation, an	Oct 12
	Independent Federal Lab,	Sterling
192	finds Georgia Election System Secure	30b6 Ex. 30
		Dkt. 1486-1
		Oct 12
		Sterling
193	Executive Summary - July 2022 MITRE Report	30b6 Ex. 31
		Oct 12
	Email chain with Michael Barnes, Blake Evans, and	Sterling
194	others	30b6 Ex. 32
		Feb. 24, 2022
		SOS
		30b6
10.5		(Sterling) Ex.
195	Gabe Sterling LinkedIn	2
		Feb. 24, 2022
		SOS
		30b6
106	Excerpted pages of "Integrity Counts" by Brad	(Sterling) Ex.
196	Raffensperger	3
		Feb. 24, 2022
		SOS
	NI 02 2021 C. (D. C.) D. (C. 1' DI.)	30b6
107	Nov. 23, 2021 State Defs.' Responses to Curling Pls.'	(Sterling) Ex.
197	Requests for Admission	F-1- 24 2022
		Feb. 24, 2022
		SOS
		30b6
198	CTATE DECENDANTS 00112751	(Sterling) Ex. 8
198	STATE-DEFENDANTS-00113751	
		Feb. 24, 2022 SOS
		30b6
		(Sterling) Ex.
199	STATE-DEFENDANTS-00169353	10
1//	STATE DELEMBER 10-0010/333	10

PX No.	Document Description	Citation
		Feb. 24, 2022
		SOS
		30b6
		(Sterling) Ex.
200	STATE- DEFENDANTS-00192602	11
		Feb. 24, 2022
		SOS
		30b6
		(Sterling) Ex.
		12
		Mar. 10, 2022
		SOS
		30b6 (Beaver)
201	Audio Recording - Scott Hall	Dep. Ex. 12
		Feb. 24, 2022
		SOS
		30b6
		(Sterling) Ex.
202	STATE-DEFENDANTS-11151729	17
		Feb. 24, 2022
		SOS
		30b6
202	D ' ' W' 1 1 W 1'1 1 11 ' ' '	(Sterling) Ex.
203	Dominion Voting brochure re: Mobile ballot printing	18
		Feb. 24, 2022
	Co Codo Ann S 21 2 400 Decentification	SOS
	Ga. Code Ann. § 21-2-498. Precertification	30b6
204	tabulation audits; rules and regulations; risk-limiting	(Sterling) Ex.
204	audit pilot program	19 Eab 24 2022
		Feb. 24, 2022 SOS
		30b6
		(Sterling) Ex.
205	Rule 183-1-1504 Audit	20
203	Kuic 163-1-1304 Audit	Feb. 24, 2022
		SOS
206	Arlo instructions re ballot manifest	30b6
200	A 11 to morrous to band, maintest	5000

PX No.	Document Description	Citation
		(Sterling) Ex.
		21
		Feb. 24, 2022
		SOS
		30b6
	CGG06SterlingDeKalbBatchSheetsListOfficialArlo	(Sterling) Ex.
207	withCGGtotal_XLS.xl sx	22
		Feb. 24, 2022
		SOS
	Kemp Ltr to SEB re analysis of inconsistencies with	30b6
200	Fulton County 2020 Risk-Limiting Audit Report	(Sterling) Ex.
208	(RLA)	23
		Feb. 24, 2022
		SOS
		30b6
209	Dak alb County Audit Board Potch Shoot 0262	(Sterling) Ex.
209	DeKalb County Audit Board Batch Sheet 0262	
		Feb. 24, 2022 SOS
		30b6
		(Sterling) Ex.
210	DeKalb County Audit Board Batch Sheet 0260	25
	Borrano country france Bourn Butter Shoot (20)	Feb. 24, 2022
		SOS
		30b6
		(Sterling) Ex.
211	DeKalb County Audit Board Batch Sheet 0140	27
		Feb. 24, 2022
		SOS
		30b6
		(Sterling) Ex.
212	DeKalb County Audit Board Batch Sheet 0117	28
		Feb. 24, 2022
		SOS
		30b6
212		(Sterling) Ex.
213	DeKalb County Audit Board Batch Sheet 0104	29

PX No.	Document Description	Citation
		Feb. 24, 2022
		SOS
		30b6
	Senator Walker & Rep. Blackmon Ltr to SEB re	(Sterling) Ex.
214	Kemp's report re 2020 Risk-Limiting Audit Report	30
		Feb. 24, 2022
		SOS
		30b6
215	Fox5Atlanta: Software glitch causes delay counting	(Sterling) Ex.
215	thousands of votes in Gwinnett County	32
		Feb. 24, 2022
		SOS 30b6
	Whittian Daily Navya: A babind the george look at	
216	Whittier Daily News: A behind the scenes look at Georgia's vote-counting	(Sterling) Ex.
210	Defendants Secretary of State Brad Raffensperger,	33
	State Election Board, and State Election Board	June 27, 2019
	Members' Response to Order Dated April 16,	Barnes (DRE)
217	2019	Ex. 20
		June 27, 2019
	CGG's ORR to Jeff Milsteen, KSU (190pgs of	Barnes (DRE)
218	material)	Ex. 21
		June 27, 2019
	Diebold Election Systems, Inc. 2005 GEMS 1.18	Barnes (DRE)
219	User's Guide, 12.4 Challenge Board	Ex. 22
		June 27, 2019
	Diebold Election Systems, Inc. 2005 GEMS 1.18	Barnes (DRE)
220	User's Guide, 2.3 Deleting a Database	Ex. 23
		June 27, 2019
		Barnes (DRE)
221	Ballot image printout from GEMS computer	Ex. 24
		June 27, 2019
		Barnes (DRE)
222	Ballot image report from a GEMS computer	Ex. 25
		June 27, 2019
222		Barnes (DRE)
223	Handwritten note about Fulton precinct	Ex. 26

PX No.	Document Description	Citation
		June 27, 2019
	Direct Record Electronic Voting Machine Recap	Barnes (DRE)
224	records	Ex. 27
		June 27, 2019
		Barnes (DRE)
225	Photo of machine serial numbers of DRE machines	Ex. 28
		June 27, 2019
		Barnes (DRE)
226	USA vs. Netyksho, et al. Indictment	Ex. 29
	Russian Targeting of Election Infrastructure During	June 27, 2019
	the 2016 Election: Summary of Initial Findings and	Barnes (DRE)
227	Recommendations, May 8, 2018	Ex. 30
		June 27, 2019
	"Who, What, Why" article titled "Kemp's Aggressive	Barnes (DRE)
228	Gambit to Distract from Election Security Crisis."	Ex. 31
	SOS Press Release: After Failed Hacking Attempt	June 27, 2019
	SOS Launches Investigation into Georgia	Barnes (DRE)
229	Democratic Party	Ex. 32
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
230	Michael Barnes LinkedIn	Ex. 2
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
231	Michael Barnes LinkedIn	Ex. 3
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
232	Dominion017810	Ex. 5
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
233	STATE-DEFENDANTS-00157766	Ex. 6

PX No.	Document Description	Citation
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
234	STATE-DEFENDANTS-00158494	Ex. 8
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
235	STATE-DEFENDANTS-00157783	Ex. 9
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
236	Dominion042072	Ex. 10
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
237	Dominion042114	Ex. 11
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
238	Dominion042575	Ex. 13
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
239	Dominion042641	Ex. 14
		Feb. 11, 2022
		SOS
		30b6 (M.
240	D 0.42502	Barnes) Dep.
240	Dominion042793	Ex. 15
		Feb. 11, 2022
	5	SOS
241	Dominion043491	30b6 (M.

PX No.	Document Description	Citation
		Barnes) Dep.
		Ex. 17
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
242	Dominion043648	Ex. 19
		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
243	Dominion043765	Ex. 20
		Feb. 11, 2022
		SOS
		30b6 (M.
244	A 4 2020 F '1 C1 ' C B' 1 B	Barnes) Dep.
244	Aug. 4, 2020 Email Chain from Rick Barron	Ex. 23
		Feb. 11, 2022 SOS
		30b6 (M.
245	STATE-DEFENDANTS-00161074	Barnes) Dep. Ex. 24
243	STATE-DEFENDANTS-001010/4	Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
246	STATE-DEFENDANTS-00127945	Ex. 25
2.0		Feb. 11, 2022
		SOS
		30b6 (M.
		Barnes) Dep.
247	Dominion069731	Ex. 26
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
248	Chris Harvey LinkedIn	Dep. Ex. 2

PX No.	Document Description	Citation
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
249	STATE-DEFENDANTS-00108321	Dep. Ex. 6
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
250	STATE-DEFENDANTS-00108787	Dep. Ex. 7
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
251	STATE-DEFENDANTS-00110230	Dep. Ex. 8
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
252	STATE-DEFENDANTS-00115480	Dep. Ex. 9
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
253	STATE-DEFENDANTS-00117430	Dep. Ex. 10
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
		Dep. Ex. 12
		Feb. 2, 2022
		SOS
		30b6 (Beaver)
		Dep. Ex. 12
		Mar. 10, 2022
		SOS
		30b6 (Beaver)
		Dep. Ex. 8
2-1	TOPT: 110T001200	Hamilton
254	FORTALICE001209	Dep. Ex. 15
		Jan. 28, 2022
		SOS
	5	30b6 (Harvey)
255	Dominion069648	Dep. Ex. 13

PX No.	Document Description	Citation
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
256	Dominion072216	Dep. Ex. 14
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
257	Dominion074766	Dep. Ex. 16
		Jan. 28, 2022
		SOS
		30b6 (Harvey)
258	Dominion074784	Dep. Ex. 17
		Jan. 28, 2022
		SOS
2.50	D	30b6 (Harvey)
259	Dominion076086	Dep. Ex. 18
		Jan. 28, 2022
		SOS
260	CTATE DEEENDANTS 0000007	30b6 (Harvey)
260	STATE-DEFENDANTS-00200997	Dep. Ex. 19
		Jan. 28, 2022
		SOS
261	CTATE DECENDANTS 00165620	30b6 (Harvey)
261	STATE-DEFENDANTS-00165630	Dep. Ex. 20
		Jan. 28, 2022 SOS
		30b6 (Harvey) (CGG Dep.
262	§ 21-2-379.22	Ex. 1)
202	8 21-2-31).22	Jan. 28, 2022
	Photo by Chris Aluka Berry (Reuters) "People cast	SOS
	their ballots during early voting for the presidential	30b6 (Harvey)
	elections at State Farm Arena in Atlanta,	(CGG Dep.
263	Ga., October 12, 2020"	Ex. 4)
		Jan. 28, 2022
	Secure the Vote: Precinct Layout to Aid with Privacy	SOS
264	Training	30b6 (Harvey)

PX No.	Document Description	Citation
	-	(CGG Dep.
		Ex. 12)
		Jan. 28, 2022
		SOS
	Dec. 1, 2020 - Chris Harvey Official Election	30b6 (Harvey)
265	Bulletin re "Preserving Ballot Images and Delivering	(CGG Dep.
265	to Sec. of State"	Ex. 14)
		Jan. 28, 2022
		SOS
	E	30b6 (Harvey)
266	Excerpt of Rockdale000924 (with highlighting	(CGG Dep.
266	added)	Ex. 16)
		Jan. 31, 2022
	Continue District Third Amonda I National	Fulton Cnty
267	Curling Plaintiffs' Third Amended Notice of	30b6 (Barron)
207	Deposition of Fulton County D	Dep. Ex. 1
		Jan. 31, 2022 Fulton Cnty
	E-mail string from Scott Tucker to Blake Evans re	30b6 (Barron)
268	Two ballots printing	Dep. Ex. 9
200	Two bands printing	Jan. 31, 2022
	E-mail string from Chris Harvey to Richard Barron	Fulton Cnty
	re Fulton County - Machines Down and Polling	30b6 (Barron)
269	Places Not Open	Dep. Ex. 10
		Jan. 31, 2022
		Fulton Cnty
	E-mail string from Blake Evans to Richard Barron &	30b6 (Barron)
270	others re Elections complaint from Thomas Elliott	Dep. Ex. 13
	•	Jan. 31, 2022
	E-mail string from Richard Barron to Brigitte Bailey,	Fulton Cnty
	Gabriel Sterling and Dwight Brower re Fulton	30b6 (Barron)
271	Advance Voting Issue	Dep. Ex. 19
		Jan. 31, 2022
	E-mail string from Richard Barron to Julie Houk and	Fulton Cnty
	Ryan Germany re Urgent demands to send corrected	30b6 (Barron)
272	absentee ballots to Fulton Co. Voters	Dep. Ex. 27

PX No.	Document Description	Citation
	12-14-18, E-mail from Richard Barron to list re	Jan. 31, 2022
	Voting system input from Fulton County, and	Fulton Cnty
	1-3-19 E-mail from Joseph Kirk to list re My	30b6 (Barron)
	thoughts about our next	Dep. Ex. 31
273	voting system	
		Jan. 31, 2022
		Fulton Cnty
25.4	E-mail string from Gabriel Sterling to Chris Harvey	30b6 (Barron)
274	re Fulton County ExpressPolls	Dep. Ex. 33
		Jan. 31, 2022
		Fulton Cnty
275		30b6 (Barron)
275	Seven Hills Strategies report re State Election Board	Dep. Ex. 34
		Jan. 31, 2022
		Fulton Cnty
276	Seven Hills Strategies report re State Election Board	30b6 (Barron)
276	- Post-Election Executive Summary	Dep. Ex. 35
		Feb. 2, 2022
		SOS
277	Mamitt Daaron Linkadla	30b6 (Beaver)
277	Merritt Beaver LinkedIn	Dep. Ex. 4
		Feb. 2, 2022 SOS
	Email shain no action items for the Air Con Elections	
278	Email chain re action items for the Air Gap Elections Center Network	30b6 (Beaver) Dep. Ex. 6
270	Center Network	
		Feb. 2, 2022 SOS
	Email chain re Dominion tech on the Gwinnett video	30b6 (Beaver)
279	used a flash drive on a laptop connected to E-Net	Dep. Ex. 7
217	asea a mash drive on a raptop connected to L-Net	Feb. 2, 2022
		SOS
		30b6 (Beaver)
280	Information Technology Security Program Charter	Dep. Ex. 9
	Tropium enuiter	Feb. 2, 2022
		SOS
	July 2020 Email re Statement of Work & Rules of	30b6 (Beaver)
281	Engagement with Fortalice	Dep. Ex. 11

PX No.	Document Description	Citation
		Hamilton
		Dep. Ex. 1
		Feb. 2, 2022
		SOS
		30b6 (Beaver)
		Dep. Ex. 13
		Mar. 10, 2022
		SOS
		30b6 (Beaver)
		Dep. Ex. 9
	Email chain re threat "I bet I can hack your electronic	Hamilton
282	voting machines."	Dep. Ex. 11
		Feb. 2, 2022
		SOS
		30b6 (Beaver)
	Email from Dave Hamilton to Merritt Beaver re Risk	Dep. Ex. 19
	Register and attaching "SOS - Remediation Task List	Hamilton
283	v13.1.xlsx"	Dep. Ex. 21
		Feb. 2, 2022
		SOS
		30b6 (Beaver)
		Dep. Ex. 20
• • •		Hamilton
284	SOS - Remediation Task List v13.1.xlsx	Dep. Ex. 22
		Feb. 2, 2022
		SOS
20.5	Alert re ransomware infection affecting Jekyll Island	30b6 (Beaver)
285	Authority	Dep. Ex. 21
		Feb. 2, 2022
		SOS
207	July 10, 2020 Rules of Engagement (Fortalice & GA	30b6 (Beaver)
286	SOS)	Dep. Ex. 22
		Feb. 2, 2022
		SOS
207		30b6 (Beaver)
287	Email chain from Dave Hamilton re TeamViewer	Dep. Ex. 23

PX No.	Document Description	Citation
		Feb. 2, 2022
		SOS
		30b6 (Beaver)
288	Email chain re BMDs not reading the cards	Dep. Ex. 25
		Feb. 2, 2022
		SOS
	Email chain between IT department and Civix re	30b6 (Beaver)
289	Latest Version of Open Issues Tracking	Dep. Ex. 26
		Feb. 2, 2022
		SOS
	Email chain re security vulnerabilities identified in	30b6 (Beaver)
290	PCC scan from Fortalice	Dep. Ex. 27
		Feb. 2, 2022
		SOS
	Email chain re Election Center - Infrastructure Server	30b6 (Beaver)
291	- Proposed changes	Dep. Ex. 28
		Mar. 10, 2022
		SOS
	FORTALICE003625 (Aug. 25, 2020 Draft Technical	30b6 (Beaver)
292	Assessment (15 pgs))	Dep. Ex. 4
		Mar. 10, 2022
		SOS
	FORTALICE003678 (Aug. 25, 2020 Draft Technical	30b6 (Beaver)
293	Assessment (14 pgs))	Dep. Ex. 5
		Mar. 10, 2022
		SOS
	FORTALICE000650 (Nov. 25, 2020 Fulton County	30b6 (Beaver)
294	Laptop Forensic Review)	Dep. Ex. 7
		Mar. 10, 2022
		SOS
205	Curling Plaintiffs' Fifth Amended Notice of	30b6 (Beaver)
295	Deposition of Office of the Secretary of State	Dep. Ex. 11
		Hamilton
201	D 1177 11 17	Dep. Ex.
296	David Hamilton LinkedIn	2
	Email from Logan Lamb to Merle King, later	Hamilton
• • •	forwarded to Michael Barnes	Dep. Ex.
297	re KSU server	3

PX No.	Document Description	Citation
		Hamilton
298	Fortalice Task Order re Incident Response Support	Dep. Ex. 6
		Hamilton
299	Fortalice Status Updates	Dep. Ex. 7
		Hamilton
	Email from Dave Hamilton re Potential leakage of	Dep. Ex.
300	voter data	9
	CBS Atlanta article "UPDATE: Ransomeware	Hamilton
	Attackers Hit Hall County	Dep. Ex.
301	Election Infrastructure"	10
	Email chain re Election Center Visit Notes and	Hamilton
	enclosing "SOS - Site	Dep. Ex.
302	Visit.docx"	12
		Hamilton
		Dep. Ex.
303	SOS - Site Visit.docx	13
		Hamilton
		Dep. Ex.
304	Email from Dave Hamilton re encryption	20
		Hamilton
	Email chain re CyberSecurity Incident Response	Dep. Ex.
305	Plan	24
		Chaney Dep.
306	Curling Pls Doc Subpoena to Eric Chaney	Ex. 1
		Chaney Dep.
307	Coalition Pls Doc Subpoena to Eric Chaney	Ex. 2
		Chaney Dep.
308	Chaney Response to Coalition Pls Doc Subpoena	Ex. 3
	Dec. 10, 2020 Letter to House Governmental Affairs	Chaney Dep.
309	Committee	Ex. 6
	Email chain with Emma Brown (WaPo), Jennifer	Chaney Dep.
	Herzog & Eric Chaney	Ex. 8
310	denying Coffee County breach	LA. U
		Chaney Dep.
		Ex.
311	Robert A. Sinners LinkedIn	12

PX No.	Document Description	Citation
		Chaney Dep.
		Ex. 13
		Hampton Dep.
		Ex.
312	Shawn Still v. Raffensperger Complaint	12
		J. Barnes Dep.
	"TLP: White" Version of CISA's ICS advisory, U.S.	Ex. 2
	Dep't of Homeland Security, Cybersecurity &	Coffee
	Infrastructure Security Agency, Vulnerabilities	County BOE
	Affecting Dominion Voting Systems Image Cast X ,	30b6 (Stone)
313	ICS Advisory No. ICSA- 22-154-01 (June 3, 2022)	Dep. Ex. 30
	"TLP: Red" Version of CISA's ICS advisory, U.S.	
	Dep't of Homeland Security, Cybersecurity &	
	Infrastructure Security Agency, Vulnerabilities	
	Affecting Dominion Voting Systems ImageCast X ,	
	ICS Advisory No. ICSA- 22-XXX-0X (STATE-	
314	DEFENDANTS-00202234-38)	
		Cotton Dep.
315	Letter enclosing BC0001-0008	Ex. 3
	Mark Niesse, Pro-Trump tech team copied Georgia	Cotton Dep.
216	election data, record	Ex. 4
316	show, Atlanta-Journal Constitution	G 00
		Coffee
	Coffee County BOE 30b6 (Stone) Dep. Ex. 2 –	County BOE
217	Coffee County Surveillance Video still shots of Eric	30b6 (Stone)
317	Chaney (Jan. 7 & 8)	Dep. Ex. 2
		Coffee
		County BOE
		30b6 (Stone)
	Collection of CC DOE Monthly Doord Marting	Dep. Ex. 10
318	Collection of CC BOE Monthly Board Meeting Minutes (25 pgs)	Chaney Dep. Ex. 7
310	Minutes (25 pgs)	Coffee
		County BOE
		30b6 (Stone)
319	Eric Chaney Resignation from CC BOE	Dep. Ex. 11
317	Life Chancy Resignation Holli CC DOL	Dch. Ex. 11

PX No.	Document Description	Citation
		Coffee
		County BOE
		30b6 (Stone)
		Dep. Ex. 23
	Emails re Misty Hampton's ORR request for the	Hampton Dep.
320	surveillance videos & timesheets	Ex. 7
		Coffee
		County BOE
		30b6 (Stone)
		Dep. Ex. 26
		SullivanStrick
		ler 30b6
		(Felicetti)
		Dep. Ex. 6
221	SullivanStrickler Engagement Agreement with Jesse	Cruce Dep.
321	Binnall ("subsequent work in the State of Georgia"	Ex. 4 Coffee
		County BOE 30b6 (Stone)
		Dep. Ex.
322	Dominion089393	Dep. Ex.
322	Declaration of Jeffrey E. Lenberg re Election	Lenberg Dep.
323	Integrity Investigations Augus	Ex. 2
328	"Coffee Messages.pdf" produced by Doug Logan on	Lenberg Dep.
324	11/10/22	Ex. 3
	"12. Coffee & Pierce Cty Records Requests.pdf"	Lenberg Dep.
325	produced by Jeffrey Lenbe	Ex. 6
	Jan 27 & 29, 2021 Lenberg surveillance video still	Lenberg Dep.
326	shots (re ring light)	Ex. 9
		Lenberg Dep.
	Jan 18-19, 2021 Lenberg surveillance video still	Ex.
327	shots (exterior arrival & ex	11
		Lenberg Dep.
	Jan. 27, 2021 ORR request from Jeff Lenberg to	Ex.
328	Misty Hampton re thumb d	14
		J. Barnes Dep.
	Oct. 27, 2021 Email from Charles Dial re Misty	Ex.
329	Hampton email recovery	1

PX No.	Document Description	Citation
		Hampton Dep.
	Misty Hampton Messages with "Gary W Diminion"	Ex.
330	(Full - 13 pages total)	2
		Hampton Dep.
	Jan 7 surveillance video still shot (Cathy Latham in	Ex.
331	Interior) - 1 image	17
		Hampton Dep.
	Jan 7 surveillance video still shot (interior) - 8	Ex.
332	images	19
		Ridlehoover
	DouglasNow Article "Board of Elections accepts	Dep.
333	employee resignations, ele	Ex. 1
		Ridlehoover
	Stillshot of Jil Ridlehoover in DouglasNow	Dep.
334	"Dominion Voting Machine Fla	Ex. 3
	2 11 1 2 2 2 1 1 2 1 1 2 1 1 2	Ridlehoover
22.5	Stillshot of Ed Voyles, Wendell Stone, and Diana	Dep.
335	(Misty's daughter) in Dou	Ex. 5
		Ridlehoover
226	Stillshot of Matthew McCullough in DouglasNow	Dep.
336	"Dominion Voting Mach	Ex. 13
		Ridlehoover
		Dep. Ex. 15
		SullivanStrick
	CEGM 4 C C C 4 1 ' EMC	ler 30b6
227	CES Memos to Coffee County enclosing EMS	(Felicetti)
337	passwords for elections (as c	Dep. Ex. 13
220	Text Messages produced by Doug Logan re Coffee	Logan Dep.
338	County trip	Ex. 4
		Logan Dep. Ex. 5
		SullivanStrick
		ler 30b6
	Excerpt of SullivanStrickler - Log of email addresses	(Felicetti)
339	that have access to CC	Dep. Ex. 16
337	Screenshot from drive produced by Doug Logan	Logan Dep.
340	(screenshot created by CG	Ex. 9
210	(Servembnot element of Co	1/A.)

PX No.	Document Description	Citation
		SullivanStrick
		ler
		30b6
		(Felicetti)
341	Headshot of Jennifer Jackson	Dep. Ex. 3
		SullivanStrick
		ler 30b6
		(Felicetti)
342	Headshot of Karuna Naik	Dep. Ex. 4
		SullivanStrick
		ler 30b6
		(Felicetti)
343	Headshot of Paul Maggio	Dep. Ex. 5
		SullivanStrick
		ler 30b6
	SullivanStrickler Engagement Agreement with	(Felicetti)
344	Sidney Powell (Michigan work)	Dep. Ex. 7
		SullivanStrick
		ler
		30b6
	Text Messages produced by Paul Maggio (one with	(Felicetti)
345	Cathy Latham, one with	Dep. Ex. 9
		SullivanStrick
		ler 30b6
	Folder Tree of data produced by SullivanStrickler	(Felicetti)
346	"SSA1722 HARD DRIV	Dep. Ex. 14
		SullivanStrick
		ler 30b6
	Email from Jennifer Jackson to Paul Maggio, Greg	(Felicetti)
347	Freemyer, and Karuna N	Dep. Ex. 20
		SullivanStrick
		ler 30b6
		(Felicetti)
348	SSA 1722 Coffee County.xlsx	Dep. Ex. 21
		SullivanStrick
		ler 30b6
	Defending the Republic, Inc. check made out to	(Felicetti)
349	SullivanStrickler for \$26,2	Dep. Ex. 28

PX No.	Document Description	Citation
	Email chain (Favorito, Voyles, Hampton, Latham,	Voyles Dep.
350	Marks) forwarding Chris	Ex. 9
		Voyles Dep.
351	Jan 7 Surveillance video still shots (with Ed Voyles)	Ex. 10
	Jan 7 Surveillance video still shots (Ed Voyles	Voyles Dep.
352	carrying in scanner)	Ex. 11
	March 8-9, 2021 Marilyn Marks text messages with	Voyles Dep.
353	Ed Voyles	Ex. 14
		Latham Dep.
354	Curling Pls' Subpoena to Latham	Ex. 1
	CGG Subpoena to Latham and Ex. 1 (Draft	Latham Dep.
355	Executive Orders - Dec 16 & 1	Ex. 2
	Dec. 23, 2020 Dominion's Notice of Obligation to	Latham Dep.
356	Preserve Documents to C	Ex. 4
	Draft Executive Order "Presidential Findings to	Latham Dep.
357	Preserve Collect and Analy	Ex. 5
	Jan. 6, 2021 Email from Misty Hampton to Scott	Cruce Dep.
358	Hall enclosing "ICC LOG	Ex. 2
		Cruce Dep.
359	Jan. 7 Surveillance video still shots of Alex Cruce	Ex. 3
	Article entitled "Why computer scientists prefer	Gilbert Dep.
360	paper ballots"	Ex. 4
		Gilbert Dep.
361	Gilbert Twitter	Ex. 7
	Nov. 8, 2019 Engagement Letter between GA SOS &	Gilbert Dep.
362	SEB and Dr. Juan Gil	Ex. 8
2.62	Excerpt of Gusciora v. Corzine, Mar. 24, 2009 Trial	Gilbert Dep.
363	Tr. (Dr. Shamos)	Ex. 9
364	Donna Curling ENET Report (Redacted)	Dkt. 1569-18
365	Donna Price ENET Report (Redacted)	Dkt. 1569-21
366	Jeffrey Schoenberg ENET Report (Redacted)	Dkt. 1569-23
367	Schoenberg Absentee ENET Report	Dkt. 1569-24
368	Laura Digges ENET Report (Redacted)	Dkt. 1569-29
369	William Digges ENET Report (Redacted)	Dkt. 1569-32
370	Ricardo Davis ENET Report (Redacted)	Dkt. 1569-34
371	Megan Missett ENET Report (Redacted)	Dkt. 1569-36
372	Redacted GBI Report	

PX No.	Document Description	Citation
	S. Ellis letter to V. Reynolds, "Request for Assistance	
	in Investigation,"	
373	Aug. 2, 2022	
	R. Germany email to S. Ellis, S. Koth, re: meeting	
	with GBI Agents, Aug.	
374	17, 2022.	
	S. Ellis email to J. Herzog, A. Rowell, R. Germany	
	re: Coffee County SEB	
375	Investigation, July 21, 2022.	
376	SOS-INV000010	
377	SOS-INV000084	
	W. Stone email to S. Koth re: "Coffee County	
	Elections Investigation",	
378	June 7, 2023	
	Stephanie Texts 06-03-forward.pdf - AZ Senate	
	shared in their "Reading Room"	
	[https://web.tresorit.com/l/XMN4J#pqSHHqcq_c_eP	
379	90cdWcdSg], in the folder "2023-07-26 Uploads".	
	June 9, 2020 – Presidential Preference Primary –	
	General Primary – Nonpartisan General Election –	
	Special Election:	
	https://results.enr.clarityelections.com//GA//103613/	
	256509/reports/summ ary.zip	
	(obtained from	
	https://results.enr.clarityelections.com/GA/103613/w	
	eb.255599/#/summary	
380		
	November 3, 2020 - General Election:	
	https://results.enr.clarityelections.com//GA//105369/	
	271927/reports/summ ary.zip	
	(obtained from	
	https://results.enr.clarityelections.com/GA/105369/w	
	eb.264614/#/summary	
381		

PX No.	Document Description	Citation
	January 5, 2021 – Federal Runoff:	
	https://results.enr.clarityelections.com//GA//107556/	
	275242/reports/summ ary.zip	
	(obtained from	
	https://results.enr.clarityelections.com/GA/107556/w	
	eb.274956/#/summary	
382		
	May 24 2022 – General Primary/Special Election:	
	https://results.enr.clarityelections.com//GA//113667/	
	294374/reports/summ ary.zip	
	(obtained from	
	https://results.enr.clarityelections.com/GA/113667/w	
	eb.285569/#/summary	
383		
	November 8, 2022 – General/Special Election:	
	https://results.enr.clarityelections.com//GA//115465/	
	314082/reports/summ ary.zip	
	(obtained from	
	https://results.enr.clarityelections.com/GA/115465/w	
204	eb.307039/#/summary	
384)	DV01 (Cont
		PX01 (Sept. 2020
385	Favotta hallat from Diggayyany 00010, 00000, 052769	
363	Fayette ballot from Discovery 00010_00000_052768	PI Hearing)
	Dominion Voting, Democracy Suite Windows Build	PX09 (Sept. 2020
386	Document Document	PI Hearing)
300	Document	PX10 (Sept.
		2020
387	EAC Certification	PI Hearing)
301	Lite confidencia	PX53 (Sept.
		2020
388	Emergency ballot exhibit with hand-marking	PI Hearing)
300	Charles Stewart III & Stephen Ansolabehere, Waiting	PX61 (Sept.
	to Vote, 14 Election	2020
389	L. J. 47 (2015)	PI Hearing)
389	L. J. 47 (2013)	ri nearing)

PX No.	Document Description	Citation
	William A. Edelstein & Arthur D. Edelstein, Queuing	
	and Elections: Long Lines, DREs and Paper Ballots,	PX62 (Sept.
	as presented at the 2010 Electronic Voting	2020
	Technology Workshop/Workshop on Trustworthy	PI Hearing)
390	Elections, in Washington, D.C., Aug. 9-10, 2010.	
		PD17 (Sept.
		2020
391	Gilbert Demonstrative: Spreadsheet Example	PI Hearing)
		PX40 (Sept.
		2020
392	Dominion043404	PI Hearing)
		PX51 (Sept.
		2020
393	Dominion043477	PI Hearing)
		PX54 (Sept.
		2020
394	Pro V&V 5.5A GA	PI Hearing)
		PD16 (Sept.
	Stark Demonstrative: Georgia Attorney General	2020
395	Contest, 2018	PI Hearing)
		PX04 (Sept.
		2020
396	Fulton games	PI Hearing)
		PX05 (Sept.
		2020
397	Cherokee Xbox games	PI Hearing)
		PX06 (Sept.
		2020
398	Application log gap	PI Hearing)
		PX07 (Sept.
	Uncounted ICC ballots (Excerpt of Dkt. No. 809-5,	2020
399	Marks Declaration)	PI Hearing)
		PX07.1 (Sept.
		2020 PI
400	Fulton County ballot examples	Hearing)
		PX12 (Sept.
		2020
401	Ballot 28 different results	PI Hearing)

PX No.	Document Description	Citation
		PX13 (Sept.
		2020
402	Adjudicated image 11.59.32	PI Hearing)
		PX17 (Sept.
		2020
403	Blank Ballot Dufort	PI Hearing)
		PX04 (July
		2019
404	Russian Targeting of Election Infrastructure	PI Hearing)
		PX05 (July
		2019
405	Mar. 1, 2017 Email Chain discussing KSU Breach	PI Hearing)
		PX06 (July
		2019
406	March 3, 2017 KSU memo re Election-related files	PI Hearing)
	Aug. 1, 2018 Chris Harvey Bulletin to election	PX15 (July
	officials re CGG	2019
407	communication	PI Hearing)
		PX07 (July
400		2019
408	Fortalice Interview Questions	PI Hearing)
		PX08 (July
400		2019
409	Fortalice Interview Notes	PI Hearing)
410	Exhibits to Aug. 11, 2017 Declaration of Chris	Dkt. 49-2
	Harvey Declaration of Michael Shames, Ph. D., J.D.	D1+ 472 1
411	Declaration of Michael Shamos, Ph.D., J.D.	Dkt. 472-1
412	Exhibit A to Declaration of Michael Shamos, Ph.D.,	Dkt. 472-1
412	J.D. Affidavit of Nathon D. Woods	D1+ 510.2
413	Affidavit of Nathan D. Woods	Dkt. 510-3
414	Appendices A & B to Affidavit of Nathan D. Woods Exhibits 1 & 2 to Declaration of David D. Cross	Dkt. 510-3
415	Exhibits 1 & 2 to Declaration of David D. Cross	Dkt. 692-1
416	Affidavit of Nathan D. Woods	Dkt. 692-2
417	Appendices A & B to Affidavit of Nathan D. Woods Exhibit 1 to Avg 28, 2020 Declaration of Chris	Dkt. 692-2
410	Exhibit 1 to Aug. 28, 2020 Declaration of Chris	Dkt. 834-3
418	Harvey	

PX No.	Document Description	Citation
	STATE-DEFENDANTS-00048065 (Exhibits to Sept.	
	1, 2020 Declaration	Dkt. 855-4
419	of David D. Cross)	
	STATE-DEFENDANTS-00048066 (Exhibits to Sept.	
	1, 2020 Declaration	Dkt. 855-4
420	of David D. Cross)	
	STATE-DEFENDANTS-00048068 (Exhibits to Sept.	
	1, 2020 Declaration	Dkt. 855-4
421	of David D. Cross)	
	STATE-DEFENDANTS-00048069 (Exhibits to Sept.	
	1, 2020 Declaration	Dkt. 855-4
422	of David D. Cross)	
	STATE-DEFENDANTS-00048070 (Exhibits to Sept.	
	1, 2020 Declaration	Dkt. 855-4
423	of David D. Cross)	
424	2021.06.28 - Expert Report of Andrew W. Appel	
	2021.07.01 - [AEO] Expert Report of Prof. J. Alex	
425	Halderman	
	Exhibits to 2021.07.01 - [AEO] Expert Report of	D1. 1121
426	Prof. J. Alex Halderman	Dkt. 1131
427	Declaration of Duncan Buell (Aug. 7, 2018)	Dkt. 260-3
	Exhibits to Declaration of Duncan Buell (Aug. 7,	D1+ 260.2
428	2018)	Dkt. 260-3
429	Declaration of Duncan Buell (June 29, 2017)	Dkt. 260-3
430	Declaration of Harri Hursti (Sept. 1, 2020)	Dkt. 853-2
431	Declaration of Harri Hursti (Dec 16, 2019)	Dkt. 680-1
432	Declaration of Harri Hursti (Aug. 21, 2020)	Dkt. 800-2
	Exhibit A to Declaration of Harri Hursti (Aug. 21,	
433	2020)	Dkt. 800-2
434	Declaration of Harri Hursti (Aug. 24, 2020)	Dkt. 809-3
	Exhibits to Declaration of Harri Hursti (Aug. 24,	D1-4 000 2
435	2020)	Dkt. 809-3
436	Declaration of Harri Hursti (Sept. 28, 2020)	Dkt. 923-2
437	Declaration of Harri Hursti (Oct. 4, 2020)	Dkt. 942-0
438	Declaration of Harri Hursti (Oct. 26, 2020)	
	Exhibits to Declaration of Harri Hursti (Oct. 26,	
439	2020)	
440	Declaration of Logan Lamb (June 30, 2017)	Dkt. 1628-15

PX No.	Document Description	Citation
441	Declaration of Logan Lamb (Aug. 3, 2018)	Dkt. 258-1
	Exhibits to Declaration of Logan Lamb (Aug. 3,	DI# 250 1
442	2018)	Dkt. 258-1
443	Declaration of Logan Lamb (Jan. 14, 2020)	Dkt. 699-10
444	Declaration of Kevin Skoglund (Oct. 22, 2019)	Dkt. 640-1
	Attachments to Declaration of Kevin Skoglund (Oct.	Dkt. 640-1
445	22, 2019)	DKt. 040-1
446	Declaration of Kevin Skoglund (Sept. 29, 2020)	Dkt. 923-3
447	Declaration of Kevin Skoglund (Oct. 4, 2020)	Dkt. 943-0
448	Declaration of Philip B. Stark (Sept. 9, 2018)	Dkt. 296-0
	Attachments to Declaration of Philip B. Stark (Sept.	Dkt. 296-0
449	9, 2018)	DKt. 290-0
450	Declaration of Philip B. Stark (Sept. 30, 2018)	
451	Declaration of Philip B. Stark (Oct. 22, 2019)	Dkt. 640-1
	Attachments to Declaration of Philip B. Stark (Oct.	Dkt. 640-1
452	22, 2019)	DKt. 040-1
453	Declaration of Philip B. Stark (Dec. 16, 2019)	Dkt. 680-1
454	Declaration of Philip B. Stark (Aug. 23, 2020)	Dkt. 809-2
455	Declaration of Philip B. Stark (Aug. 31, 2020)	Dkt. 853-1
456	Declaration of Philip B. Stark (Sept. 13, 2020)	Dkt. 891-0
		Gilbert Dep.
457	2021.07.16 - Expert Declaration of Juan Gilbert	Ex. 1
458	Declaration of Dr. Benjamin Adida (Aug. 28, 2020)	Dkt. 834-2
459	Declaration of Dr. Benjamin Adida (Sept. 17, 2020)	Dkt. 912-1
460	Attachments to Declaration of Dr. Benjamin Adida (Sept. 17, 2020)	Dkt. 912-1
	2021.07.30 - Expert Rebuttal Report of Andrew W.	
461	Appel	Dkt. 1304-4
	2021.08.02 - Expert Rebuttal Declaration of J. Alex	D1 . 1201.2
462	Halderman	Dkt. 1304-3
463	Declaration of Philip B. Stark (Aug. 2, 2021)	Dkt. 1145
	Appendix to Declaration of Philip B. Stark (Aug. 2,	D1-+ 1145
464	2021)	Dkt. 1145
465	Declaration of Philip B. Stark (Jan. 10, 2022)	Dkt. 1633-21
	Appendices to Declaration of Philip B. Stark (Jan.	Dkt. 1633-21
466	10, 2022)	DKI. 1033-21
467	2022.11.10 Persinger Declaration	Dkt. 1635-40
468	Exhibits to 2022.11.10 Persinger Declaration	Dkt. 1635-40

PX No.	Document Description	Citation
469	2022.11.22 Halderman Declaration re Coffee County	Dkt 1635-19
	2022.11.22 Halderman Exhibit A -	DI+ 1625 10
470	SSA1722 Hard Drive Contents	Dkt 1635-19
471	2022.12.05 CGG Skoglund Declaration Confidential	Dkt. 1635-44
472	2022.12.13 Second Persinger Declaration	
473	Exhibits to 2022.12.13 Second Persinger Declaration	
	2023.01.07 Halderman Suppl. Declaration re Coffee	Dkt. 1635-38
474	County	DKt. 1033-36
	2023.01.07 Halderman Exhibit_A_Regarding	
	Password Reset and	Dkt. 1635-38
475	Changed Files	
476	2023.01.07 CGG Skoglund Declaration	
477	Exhibits to 2023.01.07 CGG Skoglund Declaration	
478	STATE-DEFENDANTS-00192602	
479	STATE-DEFENDANTS-00101411	
480	STATE-DEFENDANTS-00128596	
481	STATE-DEFENDANTS-00178628	
482	STATE-DEFENDANTS-00101673	
483	STATE-DEFENDANTS-00108403	
484	STATE-DEFENDANTS-00122664	
485	STATE-DEFENDANTS-00101265	
	STATE-DEFENDANTS-00202234 (RED	
486	EMBARGOED CISA)	
	Dominion ImageCast X (ICX) Prime 21" BMD &	
487	associated peripherals	
488	Intentionally Left Blank	
489	FBI Server Image	
		Feb. 24, 2022
		SOS
		30b6
		(Sterling) Ex.
490	Audio Recording of Scott Hall Phonecall	12
	Feb. 10, 2022 AJC Audio Recording of Mark Niesse	
	& Brad Raffensperger Discussing Alex Halderman's	
	Report and Its Infeasibility in Real-World	
491	Conditions	

PX No.	Document Description	Citation
	Audio Recording of Gabe Sterling Describing Alex	
	Halderman's Report as	
492	Untrustworthy	
493	Coffee County Surveillance Videos	
	The Carter Center, Restoring Confidence in	
	American Elections Panel 3 (April 29, 2022),	
	YouTube (May 9, 2022),	
	https://www.youtube.com/watch?app=desktop&v=Pb	
	B_c_PX8D8+at+app	
494	roximately+35%3A30&feature=youtu.be	
495	Misty Hampton - DouglasNow video Pt. 1	
496	Misty Hampton - DouglasNow video Pt. 2	
497	Video of Cathy Latham - GA Senate Hearing	
498	Intentionally Left Blank	
	jeff-lenberg-reveals-details-of-forensic-investigation-	
	in-coffee-county-ga-	
499	after-wapo-hit-piece.mp4	
500	AP Image ID No. 21005555186625	
501	Image of Georgia Voting Machine, January 5, 2021	
502	June 7, 2021 BMD Photo	
	Gabe Sterling, How to safeguard democracy,	
	Universite de Geneve (Nov.	
503	25, 2021)	
	Pages 291-315 from Curling - CCBOE Docs	
	Responsive to Subpoenas (1)-	
504	Jill Resignation	
	Pages 221-245 from Curling - CCBOE Docs	
	Responsive to Subpoenas (1)-	
505	Misty Resignation	
	Pages 5-45 of CCBOE Responses No. 2 - DyAnna	
506	Hayes Resignation	
	11/10/2020 email thread between Robert Sinners and	
	Misty Hampton,	
	Sinners Requests Official Meeting Minutes and	
507	Audio of the 11/10/2020 BOE Meeting	
508	Coffee-Cnty-ORR00000231	
509	Dominion022179	
510	Dominion023452	

PX No.	Document Description	Citation
511	Dominion069797-072989 (October 2020) Part225	
512	Dominion075160-075991 (December 2020) Part095	
513	Dominion075160-075991	
	Dominion075992-076795 (January 2020)-emails	
514	only_Part098	
515	Dominion079353-081275	
516	Dominion081276-081975 (June 2021) Part026	
517	STATE-DEFENDANTS-00001942	
518	STATE-DEFENDANTS-00099430	
519	STATE-DEFENDANTS-00100970	
520	STATE-DEFENDANTS-00194205	
521	STATE-DEFENDANTS-00101321	
522	STATE-DEFENDANTS-00095935	
	"Lawsuit: New Georgia voting system denies secret	
	ballot," Feb. 25, 2020,	
523	https://www.youtube.com/watch?v=7JWiursXHEo	
	"The Office of Secretary of State State of Georgia, In	
	the Matter of: State Election Board Meeting,	
	Wednesday, June 21, 2023, Georgia State Capitol,	
	Room b341, Atlanta, Georgia, 9:00am, Volume 2 of	
	2," June 21, 2023,	
	https://sos.ga.gov/sites/default/files/forms/2023%20T	
524	ranscripts_0.pdf	
	"In The Matter Of: Athens-Clarke County Board	
	Elections and Registration, March 11, 2020," Mar.	
	11, 2020, https://sos.ga.gov/sites/default/files/2022-	
525	02/2020_seb.pdf	
	"In The Matter Of: Secretary of State Board Meeting,	
	February 28, 2020," Feb. 28, 2020,	
506	https://sos.ga.gov/sites/default/files/2022-	
526	02/2020_seb.pdf	
	"In the Matter Of: State Election Board Meeting,	
	August 1, 2023," Aug. 1, 2023,	
507	https://sos.ga.gov/sites/default/files/forms/SEB%208	
527	-01- 23_BUNDLE.pdf	

PX No.	Document Description	Citation
	"In the Matter Of: State Election Board Meeting,	
	September 28, 2022," Sept. 22, 2023,	
	https://sos.ga.gov/sites/default/files/forms/2022%20T	
528	ranscripts.pdf	
	"11/1/2023 - Senate Committee on Ethics," Nov. 1,	
	2023,	
	https://vimeo.com/showcase/9076408?video=868832	
529	917	
	"Secretary Raffensperger Continues Focus on	
	Election Security for 2024," Sept. 6, 2023,	
	https://madmimi.com/p/f406371?pact=162731-	
	175641393- 14307111335-	
530	60a0fd97a05360e4386c82a31acf06a19d9cd9b4	
531	Notice of Change in post-election audit law	Dkt 1673
		SINNERS000
	Robert Sinners communications re: Coffee	001-
532	investigation	39
533	Exhibit 1, Brown Declaration, Jan. 10, 2023	Dkt. 1629-1
534	Exhibit 2, Brown Declaration, Dec. 4, 2022	Dkt. 1629-1
535	Exhibit 1, Davis Declaration, Dec. 6, 2022	Dkt. 1629-4
536	Exhibit A, DuFort Declaration, Jan. 1, 2022	Dkt. 1629-6
537	Exhibit B, DuFort Declaration, Nov. 1, 2022	Dkt. 1629-6
538	Exhibit C, DuFort Declaration, May 24, 2022	Dkt. 1629-6
539	Exhibit D, DuFort Declaration, May 24, 2022	Dkt. 1629-6
540	Exhibit E, DuFort Declaration, Nov. 3, 2020	Dkt. 1629-6
541	Exhibit F, DuFort Declaration, Nov. 3, 2020	Dkt. 1629-6
542	Exhibit G, DuFort Declaration, Dec. 5, 2022	Dkt. 1629-6
543	Exhibit 17, Hursti Declaration, Sept. 1, 2020	Dkt. 853-2
544	Exhibit 19-A, Marks Declaration, Sept. 1, 2020	Dkt. 853-4
545	Exhibit 19-B, Marks Declaration, Aug. 28, 2020	Dkt. 853-4
546	Exhibit 19-C, Marks Declaration, Sept. 1, 2020	Dkt. 853-4
547	Exhibit 19-D, Marks Declaration, Sept. 1, 2020	Dkt. 853-4
548	Exhibit 1, Marks Declaration, Feb. 12, 2021	Dkt. 1629-8
549	Exhibit 2, Marks Declaration, Feb. 12, 2021	Dkt. 1629-8
550	Exhibit 3, Marks Declaration, Feb. 12, 2023	Dkt. 1629-8
551	Exhibit E, DuFort Declaration, Nov. 3, 2020	Dkt. 1593-5
552	Exhibit F, DuFort Declaration, Nov. 3, 2020	Dkt. 1593-6
553	Exhibit G, DuFort Declaration, Dec. 5, 2022	Dkt. 1593-7

PX No.	Document Description	Citation
554	Exhibit 1, Martin Declaration, Jan. 1, 2020	Dkt. 809-4
555	Exhibit 2, Martin Declaration, Aug. 11, 2020	Dkt. 809-4
556	Exhibit 1, Marks Declaration, Aug. 24, 2020	Dkt. 809-5
557	Exhibit 2, Marks Declaration, May 21, 2020	Dkt. 809-5
558	Exhibit 3, Marks Declaration, Aug. 11, 2020	Dkt. 809-5
559	Exhibit 4, Marks Declaration, Aug. 19, 2020	Dkt. 809-5
560	Exhibit A, DuFort Declaration, Aug. 23, 2020	Dkt. 809-6
561	Exhibit B, DuFort Declaration, June 13, 2020	Dkt. 809-6
562	Exhibit C, DuFort Declaration, Aug. 23, 2020	Dkt. 809-6
563	Exhibit D, DuFort Declaration, Aug. 10, 2020	Dkt. 809-6
564	Exhibit 1, Shirley Declaration, Aug. 11, 2020	Dkt. 809-7
565	Exhibit 2, Shirley Declaration, Aug. 11, 2020	Dkt. 809-7
566	Exhibit 3, Shirley Declaration, Aug. 11, 2020	Dkt. 809-7
567	2019-08-09 State Defs Suppl Notice re New Election	Dkt. 575
(old 46)	System Vendor Contract	DKt. 373
568		Dkt. 575-1
(old 46)	2019-08-09 Ex. A - August 9, 2019 Notice of Award	DKt. 373-1
569	2019-08-09 Ex. B - August 9, 2019 Certification of	Dkt. 575-2
(old 46)	the Dominion Voting System for Georgia	DKt. 373-2
570	State Defs' Supplement to Response to this Court's	Dkt. 552
(old 131)	July 23, 2019 Order	DKt. 332
571		Dkt. 552-1
(old 131)	SOS Notice of Intent to Award	DKt. 332-1
572	Halderman demonstration video involving Fulton	
(old 488)	County election equipment	
		PD1
573	Stillshots of Halderman demonstration video	(9/14/2020 PI
(old 488)	involving Fulton County election equipment	Hearing)
	Short video embedded in 11Alive Staff, Questions	
574	raised in timeline of state response to Coffee County	
(old 498)	breach, 11Alive News (Sep. 26, 2022, 1:44 PM)	
	Long video embedded in 11Alive Staff, Questions	
575	raised in timeline of state response to Coffee County	
(old 498)	breach, 11 Alive News (Sep. 26, 2022, 1:44 PM)	

PX No.	Document Description	Defs.' Objection(s)
1	Harri Hursti, Diebold TSx Evaluation, Security Alert - May 11, 2006, Critical Security Issues with Diebold TSx, BlackBoxVoting.org (May 11, 2006)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401. Plaintiffs' DRE claims have been dismissed and the exhibit does not involve any components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705]. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403.
	Ariel J. Feldman, J. Alex Halderman, & Edward W. Felten, "Security Analysis of the Diebold AccuVote-TS Voting Machine," in Proc. USENIX/ACCURATE Electronic Voting Technology Workshop (2007)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401. Plaintiffs' DRE claims have been dismissed and the exhibit does not involve any components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705]. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
3	Electronic Voting System Security: Hearing Before the H. Comm. on House Admin., 108th Cong. 99-113, at 107-09 (2004) (statement of Kathy Rogers, Ga. Dir. of Election Admin)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401. Plaintiffs' DRE claims have been dismissed and the exhibit does not involve any components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705]. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403.
4	Presentation titled "The Georgia Voting System," presented by Merle S. King, Kennesaw State University, Center for Election Systems, dated February 2014	Defendants object to this exhibit on the basis of relevance. F.R.E. 401. Plaintiffs' DRE claims have been dismissed and the exhibit does not involve any components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705]. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403.
5	STATE-DEFENDANTS- 00000409	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802

PX No.	Document Description	Defs.' Objection(s)
6	FOIA Aug. 29, 2016 Email	Defendants object to this
	Chain	exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants object to this
		exhibit to the extent it
		constitutes hearsay. F.R.E. 802
7	FOIA Mar. 16-17, 2017 Email	Defendants object to this
	Chains	exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants object to this
		exhibit to the extent it
		constitutes hearsay. F.R.E. 802
8	FedEx Notice of Complaint	Defendants object to this
		exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants object to this
		exhibit to the extent it
		constitutes hearsay. F.R.E. 802
9	FOIA July 7, 2017 Email Chain	Defendants object to this
		exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants object to this
		exhibit to the extent it
		constitutes hearsay. F.R.E. 802
10	Notice of Removal	
11	FOIA Aug. 9, 2017 Email	Defendants object to this
	Chain	exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants object to this
		exhibit to the extent it
		constitutes hearsay. F.R.E. 802
12	State Defs' Response re	Defendants object to this
	Spoliation of Evidence	exhibit on the basis of
		relevance. F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
13	Frank Bajak, Georgia election server wiped after suit filed, AP News (Oct. 26, 2017)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
14	Jan. 8, 2020 Decl. of J. Alex Halderman, Ph.D. with Appx. A: Matthew Bernhard et al., Can Voters Detect Malicious Manipulation of Ballot Marking Devices?, Univ. of Mich. (2020)	constitutes nearsay. F.R.E. 802
15	Ledford Dep. Ex. 6 – KSU CES Instructions re GEMS	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time. F.R.E. 403. Plaintiffs' claims related to the prior voting system have been dismissed and the exhibit does not involve components from the prior voting system that were "carried over" to the current BMD system per the Summary Judgment Order [Doc. 1705].
16	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 1 - 2022.10.10 Joint Pls.' 7th Am. 30b6 Deposition Notice to Ga. Sec'y of State's Office	

PX No.	Document Description	Defs.' Objection(s)
17	Ex. C - Feb 2018 Fortalice	
	Report	
18	Ex. A - Oct 2017 Fortalice	
	Report	
10	7.F. 10.0000 GOG 001.0	
19	Mar. 10, 2022 SOS 30b6	
	(Beaver) Dep. Ex. 3 -	
	FORTALICE003692 (Aug. 25, 2020 Draft Technical	
	Assessment (13 pgs))	
20	Feb. 2, 2022 SOS 30b6 (Beaver)	Defendants object to this
	Dep. Ex. 14 - STATE-	exhibit on the basis of
	DEFENDANTS-00126614	relevance. F.R.E. 401;
		Defendants object to this
		exhibit to the extent it, or
		portions thereof, constitutes
21	Esh 9 9099 COC 20hC (Decree)	hearsay. F.R.E. 802
21	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 15 - STATE-	Defendants object to this exhibit on the basis of
	DEFENDANTS-00126678	relevance. F.R.E. 401;
		Defendants object to this
		exhibit to the extent it, or
		portions thereof, constitutes
		hearsay. F.R.E. 802
22	Feb. 2, 2022 SOS 30b6 (Beaver)	
	Dep. Ex. 17 - STATE-	
	DEFENDANTS-00182161	
23	July 30, 2019 State Defs.'	
24	Response to Court Questions Oct. 25, 2010 Priof ISO State	
4 4	Oct. 25, 2019 Brief ISO State Defs.' Motion to Dismiss	
25	Feb. 2, 2022 SOS 30b6 (Beaver)	
	Dep. Ex. 18 - STATE-	
	DEFENDANTS-00182171	
	(2020 Rule 590-8.3 Attestation)	

PX No.	Document Description	Defs.' Objection(s)
26	Nov. 23, 2021 State Defs.' Responses to Curling Pls.' Requests for Admission (Response No. 65)	
27	Ledford Dep. Ex. 7	Defendants object to this exhibit because significant portions are unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
28	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 16 STATE- DEFENDANTS-00153091	
29	Dominion027284	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
30	STATE-DEFENDANTS- 00101382	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds

PX No.	Document Description	Defs.' Objection(s)
		that portions of it contain hearsay, F.R.E. 802.
31	STATE-DEFENDANTS- 00158640	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
32	Feb. 2, 2022 SOS 30b6 (Beaver) Dep. Ex. 29 - STATE- DEFENDANTS-00158823	
33	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 4 - Dominion001889	

PX No.	Document Description	Defs.' Objection(s)
34	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 12 - STATE-DEFENDANTS-00124842	Defendants object to this exhibit on the basis of relevance (F.R.E. 401); Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time (F.R.E. 403); Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay (F.R.E. 802).
35	Hamilton Dep. Ex. 18 - FORTALICE001163	Defendants object to this exhibit on the basis of relevance (F.R.E. 401); Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time (F.R.E. 403); Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay (F.R.E. 802).
36	Hamilton Dep. Ex. 14 - STATE- DEFENDANTS-00171971	
37	Hampton Dep. Ex. 22 (still shots captured from Misty Hampton YouTube video)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
38	Hampton Dep. Ex. 23 (image from the Coffee County Elections Office produced by Paul Maggio)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802

PX No.	Document Description	Defs.' Objection(s)
39	Hampton Dep. Ex. 24 (still shot of password on paper placed on a desktop computer)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
40	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 2 (Sept. 28, 2021 report of Coffee County investigation)	
41	Ex. A to Plaintiffs' Joint Notice of Filing Additional Evidence in Support of Renewed Motions for Attorneys' Fees and Expenses	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
42	Rev.com, Inc., Georgia Secretary of State Brad Raffensperger Press Conference Transcript: Announces Hand Recount (Nov. 11, 2020)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
43	Jan. 10, 2019 Secure, Accessible & Fair Elections (SAFE) Commission Report, submitted to the Ga. General Assembly	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
44	Aug. 28, 2019 Joint Discovery Statement Regarding Production of FBI Server Image	Defendants object to this exhibit on the basis of relevance (F.R.E. 401); Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time (F.R.E. 403); Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay (F.R.E. 802).
45	Ga. Sec'y of State, Security- Focused Tech Company, Dominion Voting to Implement new Verified Paper Ballot System (July 29, 2019)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
46	Intentionally Left Blank	
47	Dominion Contract (Cross Decl. Ex. 2 ISO Curling Plaintiffs' Motion for Preliminary Injunction)	
48	Oct. 12, 2022 SOS 30b6 Sterling Dep. Ex. 4 (tweet by Gabriel Sterling)	Defendants object to this exhibit because it is unauthenticated; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802
49	Wenke Lee Article (Jan. 3, 2019)	Defendants object to the extent Plaintiffs seek to qualify the witness as an expert and admit the exhibit as an expert report. F.R.C.P. 26(a)(2)(D); L.R. 26.2.
50	Richard A. DeMillo, Robert S. Kadel & Marilyn R. Marks, What Voters are Asked to Verify Affects Ballot Verification: A Quantitative Analysis of Voters' Memories of Their Ballots (Apr. 11, 2019)	Defendants object to the extent Plaintiffs seek to introduce the exhibit as an expert report. F.R.E. 702.

PX No.	Document Description	Defs.' Objection(s)
51	Gilbert Dep. Ex. 2 - University	Defendants object to this
	of Georgia School of Public &	exhibit because it is
	International Affairs, Georgia	unauthenticated; Defendants
	Voter Verification Study (Jan.	object to the extent Plaintiffs
	22, 2021)	seek to introduce the exhibit as
		an expert report, FRE 702; the
		exhibit contains impermissible
		opinion testimony, FRE 701;
		and Defendants object because
		the exhibit contains
		inadmissible hearsay, FRE 801,
		802. Defendants object for lack
		of foundation, FRE 602.
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time, FRE 403.
52	Jan. 7, 2019 Experts Letter to	Defendants object to this
	SAFE Commission	exhibit because it is
		unauthenticated; Defendants
		object to the extent Plaintiffs
		seek to introduce the exhibit as
		an expert report, FRE 702; the
		exhibit contains impermissible
		opinion testimony, FRE 701;
		and Defendants object because
		the letter constitutes
		inadmissible hearsay, FRE 801, 802. Lastly, the citation is to
		the entire Motion for
		Preliminary Injunction, Dkt.
		419-1, whereas the letter to the
		SAFE Commission is
		specifically located at page 426.

PX No.	Document Description	Defs.' Objection(s)
53	ELECTIONS_00000143	Defendants object because the
		exhibit contains inadmissible
		hearsay, FRE 801, 802.
		Defendants object because the
		exhibit is not relevant, FRE
		401. Defendants object to this
		exhibit because it is
		unauthenticated. Defendants
		further object to the exhibit on
		the grounds that its reception
		would be unfairly prejudicial,
		confusing, distracting, or a
		waste of time, FRE 403.
54	July 1, 2021 Coalition	Defendants object because the
	Plaintiff's Expert Disclosures –	exhibit contains substantial
	Opening Reports, along with	portions of irrelevant content
	excerpt of Supplemental Decl.	outside the scope of the issues
	of Harri Hursti, dated Sept. 1,	for trial. FRE 401. Defendants
	2020, and excerpt of Decl. of	object because the exhibit
	Philip B. Stark, dated Sept. 9,	contains inadmissible hearsay,
	2018	FRE 801, 802. Defendants
		further object to the exhibit on
		the grounds that its reception
		would be unfairly prejudicial,
		confusing, distracting, or a
		waste of time, FRE 403.

PX No.	Document Description	Defs.' Objection(s)
55	Ben Adida Twitter (Oct. 1,	Defendants object because the
	2022) ("my ideal voting model	cited portion of the tweet is
	is one where voters get to	incomplete. FRE 106. The
	choose BMD or hand marked")	tweet states in full, "And again,
		my ideal voting model is one
		where voters get to choose
		BMD or hand marked, where
		audits happen regularly, and
		where machines are maximally
		transparent and use modern
		security features." Defendants
		object because the exhibit
		contains inadmissible hearsay,
		FRE 801, 802. Defendants
		object to this exhibit because it
		is unauthenticated. Defendants
		further object to the exhibit on
		the grounds that its reception
		would be unfairly prejudicial,
		confusing, distracting, or a
		waste of time, FRE 403. Lastly,
		Defendants object because the
		exhibit is not relevant, FRE
		401.

PX No.	Document Description	Defs.' Objection(s)
PX No. 56	Ben Adida Twitter (Feb. 20, 2020) ("RLAs never confirm outcomes on their own")	Defendants object because the cited portion of the tweet is incomplete. FRE 106. The tweet states in full, "RLAs never confirm outcomes on their own. Not for BMDs, not for handmarked paper ballots. They confirm that tabulation was done correctly." Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is impermissible improper/unsupported opinion testimony, FRE 701. Defendants object for lack of foundation, FRE 602. Lastly, Defendants object to this
57	Verified Voting's Election Day Equipment map, Verified Voting, Election Day Equipment (Data from November 2022)	exhibit because it is unauthenticated. Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.

PX No.	Document Description	Defs.' Objection(s)
58	Written Testimony of Marian K. Schneider, President of Verified Voting, to Allegheny Cnty. Bd. of Elections, Public Meeting on Purchase of Voting Systems (June 7, 2019)	Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Defendants object because the exhibit is impermissible improper/unsupported opinion testimony, FRE 701. Lastly, Defendants object because the exhibit is not relevant, FRE 401.
59	Feb. 11, 2022 SOS 30b6 (M. Barnes) Dep. Ex. 21 - Dominion044536	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.

PX No.	Document Description	Defs.' Objection(s)
60	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 9 - STATE- DEFENDANTS-00172679 (Email re issues with Fulton County Batch Tally Sheets)	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.
61	Jan. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 23 - Nov. 17, 2021 Kemp Ltr to SEB re 2020 RLA Report	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.

PX No.	Document Description	Defs.' Objection(s)
62	Jan. 28, 2022 SOS 30b6 (Harvey) Dep. Ex. 15 – Dominion073354	Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403.
63	Dr. Juan Gilbert's Patent No. US 11, 036, 442 B2 for "Transparent Interactive Printing Interface"	Defendants object because the exhibit contains inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants object to this exhibit because it is unauthenticated. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object because the exhibit is not relevant, FRE 401.

PX No.	Document Description	Defs.' Objection(s)
64	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 5 – STATE- DEFENDANTS-00108789	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.
65	Fulton Cnty 30b6 (Gilstrap) Dep. Ex. 6 – STATE- DEFENDANTS-00110732	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
66	E-mail string from Ryan	Defendants object because the
	Germany to Frances Watson	exhibit contains multiple levels
	and Chris Harvey re Polling	of inadmissible hearsay, FRE
	Machine Issues	801, 802. Defendants object
		because the exhibit is not
		relevant, FRE 401. Defendants
		object for lack of foundation,
		FRE 602. Defendants further
		object to the exhibit on the
		grounds that its reception
		would be unfairly prejudicial,
		confusing, distracting, or a
		waste of time, FRE 403. Lastly,
		Defendants object to this
		exhibit because it is
		unauthenticated.
67	Dominion043450	Defendants object because the
		exhibit contains multiple levels
		of inadmissible hearsay, FRE
		801, 802. Defendants object
		because the exhibit is not
		relevant, FRE 401. Defendants
		object for lack of foundation,
		FRE 602. Defendants further
		object to the exhibit on the
		grounds that its reception
		would be unfairly prejudicial,
		confusing, distracting, or a
		waste of time, FRE 403. Lastly,
		Defendants object to this
		exhibit because it is
		unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
68	Dominion043452	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.
69	Dominion042793	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
70	Dominion043377	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.
71	Dominion043484	Defendants object because the exhibit contains multiple levels of inadmissible hearsay, FRE 801, 802. Defendants object because the exhibit is not relevant, FRE 401. Defendants object for lack of foundation, FRE 602. Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, FRE 403. Lastly, Defendants object to this exhibit because it is unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
72	Feb. 11, 2022 SOS 30b6 (M.	Defendants object because the
	Barnes) Dep. Ex. 16 –	exhibit contains multiple levels
	Dominion043437	of inadmissible hearsay, FRE
		801, 802. Defendants object
		because the exhibit is not
		relevant, FRE 401. Defendants
		object for lack of foundation,
		FRE 602. Defendants further
		object to the exhibit on the
		grounds that its reception
		would be unfairly prejudicial,
		confusing, distracting, or a
		waste of time, FRE 403. Lastly,
		Defendants object to this
		exhibit because it is
		unauthenticated.
73	Feb. 11, 2022 SOS 30b6 (M.	Defendants object because the
	Barnes) Dep. Ex. 18 - STATE-	exhibit contains multiple levels
	DEFENDANTS-001 04453	of inadmissible hearsay, FRE
		801, 802. Defendants object for
		lack of foundation, FRE 602.
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		FRE 403. Lastly, Defendants
		object to this exhibit because it
	7.1	is unauthenticated.
74	Feb. 24, 2022 SOS 30b6	Defendants object because
	(Sterling) Dep. Ex. 5 (State	portions of the exhibit are not
	Defs.' objections and responses	relevant, FRE 401. Defendants
	to Curling Pls.' first set of	further object on the same
	interrogatories)	bases as the objections asserted
		by Defendants within the
		exhibit.

PX No.	Document Description	Defs.' Objection(s)
75	Feb. 24, 2022 SOS 30b6	Defendants object because
	(Sterling) Dep. Ex. 6 (State	portions of the exhibit are not
	Defs.' objections and responses	relevant, FRE 401. Defendants
	to Curling Pls.' second set of	further object on the same
	interrogatories)	bases as the objections asserted
		by Defendants within the
		exhibit.
76	Curling Plaintiffs' joint	Defendants object to this
	discovery statement regarding	exhibit on the basis of
	State Defendants' responses to	relevance, F.R.E. 401;
	Curling Plaintiffs' second set of	Defendants further object to
	interrogatories and CISA	the exhibit on the grounds that
	request	its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
77	Oct. 21, 2021 State Defs'	Defendants object to this
	Response to Revised	exhibit on the basis of
	Interrogatories	relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
78	J. Barnes Dep. Ex. 6 - May 2021 Email re CyberNinjas	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
79	State Defendants' Motion to Seal Halderman Report	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
80	PD1 - Halderman video stills	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
81	PX02 - Side-by-side of Ballots	Defendants object to this
	from system hack	exhibit because it is
		unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
82	PX03 - Scanner Results of	Defendants object to this
	Photocopied Ballots	exhibit because it is
		unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
83	STATE-DEFENDANTS-	Defendants object to this
	00047579	exhibit on the basis of
		relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
84	Oct. 12, 2022 SOS 30b6	Defendants object to this
	(Sterling) Dep. Ex. 5 -	exhibit because it is
	Interview by Atlanta Press	unauthenticated; Defendants
	Club with Brad Raffensperger,	object to this exhibit on the
	Sec'y of State, GA (Feb. 10,	basis of relevance, F.R.E. 401;
	2022)	Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
85	Ga. Sec'y of State's	Defendants object to this
	announcement: Secretary	exhibit because it is
	Raffensperger Calls on J. Alex	unauthenticated; Defendants
	Halderman to Agree to Release	object to this exhibit on the
	"Secret Report" and Pre-	basis of relevance, F.R.E. 401;
	Election Testimony (Jan. 27,	Defendants further object to
	2022)	the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
86	Jan. 20, 2022 statement of	Defendants object to this
	interest explaining the	exhibit because it is
	vulnerability disclosure	unauthenticated; Defendants
	program operated by the U.S.	object to this exhibit on the
	Department of Homeland	basis of relevance, F.R.E. 401;
	Security	Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
87	Notice by CISA regarding CVD	Defendants object to this
	process and its timeline	exhibit on the basis of
		relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
88	CISA's 90-day status report	Defendants object to this
	updating the Court and the	exhibit on the basis of
	parties on the final steps of	relevance, F.R.E. 401;
	CISA's coordinated	Defendants further object to
	vulnerability disclosure process	the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
89	CISA's ICS advisory, U.S. Dep't	Defendants object to this
	of Homeland Security,	exhibit on the basis of
	Cybersecurity & Infrastructure	relevance, F.R.E. 401;
	Security Agency,	Defendants further object to
	Vulnerabilities Affecting	the exhibit on the grounds that
	Dominion Voting Systems	its reception would be unfairly
	ImageCast X, ICS Advisory No.	prejudicial, confusing,
	ICSA-22-154-01 (June 3, 2022)	distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
90	CISA's 30-day report on CISA's	Defendants object to this
	CVD process	exhibit on the basis of
		relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
91	CISA's 60-day status report on	Defendants object to this
	CISA's CVD process	exhibit on the basis of
		relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
92	Wenke Lee Article (Oct. 8,	Defendants object to this
	2018)	exhibit because it is
		unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
93	Nov. 17, 2021 Halderman Dep.	Defendants object to this
	Ex. 5 – Aug. 31, 2021 Decl. of J.	exhibit because it is
	Alex Halderman, Coomer v.	unauthenticated; Defendants
	Donald J. Trump for President,	object to this exhibit on the
	No. 2020cv034319 (Dist. Ct.	basis of relevance, F.R.E. 401;
	Denver Cnty. Colo.)	Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
94	FORTALICE000124 - Apr. 9,	Defendants object to this
	2021 Fortalice Technical	exhibit because it is
	Assessment	unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
95	November 2018 Fortalice	Defendants object to this
	Report	exhibit because it is
		unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
96	Feb. 2, 2022 SOS 30b6 (Beaver)	Defendants object to this
	Dep. Ex. 10 -	exhibit because it is
	FORTALICE000625	unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
97	Mar. 10, 2022 SOS 30b6	Defendants object to this
	(Beaver) Dep. Ex. 1 -	exhibit because it is
	FORTALICE003593	unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
98	Mar. 10, 2022 SOS 30b6 (Beaver) Dep. Ex. 2 - FORTALICE003807	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain
99	July 14, 2021 email from Meghan Aubry (Fortalice) to Adam Sparks	hearsay, F.R.E. 802. Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
100	Jan. 28, 2022 SOS 30b6	Defendants object to this
	(Harvey) Dep. Ex. 4 – STATE-	exhibit because it is
	DEFENDANTS-00101460	unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
101	Jan. 31, 2022 Fulton Cnty 30b6	Defendants object to this
	(Barron) Dep. Ex. 25 – STATE	exhibit on the basis of
	DEFENDANTS-00178061	relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
100	I an anna god anla	hearsay, F.R.E. 802.
102	Jan. 28, 2022 SOS 30b6	Defendants object to this
	(Harvey) Dep. Ex. 5 - STATE- DEFENDANTS-00101471	exhibit on the basis of
	DEFENDAN 15-00101471	relevance, F.R.E. 401; Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
103	Feb. 11, 2022 SOS 30b6 (M.	Defendants object to this
	Barnes) Ex. 7 - STATE-	exhibit on the basis of
	DEFENDANTS-00158505	relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
104	Feb. 11, 2022 SOS 30b6 (M.	Defendants object to this
	Barnes) Dep. Ex. 22 - STATE-	exhibit on the basis of
	DEFENDANTS-00157919	relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
105	STATE-DEFENDANTS-	Defendants object to this
	00161382	exhibit because it is
		unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
106	ELECTIONS_00000330 (Nov.	Defendants object to this
	20, 2020 email sent from	exhibit because it is
	Dwight Bower to Richard	unauthenticated; Defendants
	Barron, Derrick Gilstrap, and	object to this exhibit on the
	Timothy Cummings)	basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
107	The White House, Notice on the	Defendants object to this
	Continuation of the National	exhibit on the basis of
	Emergency With Respect to	relevance, F.R.E. 401;
	Foreign Interference In or	Defendants further object to
	Undermining Public	the exhibit on the grounds that
	Confidence in United States	its reception would be unfairly
	Elections (Sept. 7, 2022)	prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
100	E-1 9 9099 COC 201-C (D)	hearsay, F.R.E. 802.
108	Feb. 2, 2022 SOS 30b6 (Beaver)	Defendants object to this exhibit on the basis of
	Dep. Ex. 24 - STATE- DEFENDANTS-00182284	relevance, F.R.E. 401;
	DEFENDAN 15-00102204	Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
109	Jan. 28, 2022 SOS 30b6 (Harvey) Ex. 11 - STATE- DEFENDANTS-00139190	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
110	Misty Hampton Messages with Eric Chaney (Full - 24 pages total)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
111	"Text Messages.pdf" produced by Misty Hampton	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
PX No. 112	Document Description SullivanStrickler 30b6 (Felicetti) Dep. Ex. 10 - Coffee County Exterior Surveillance Video still shots (Jan. 7)	Defs.' Objection(s) Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds
113	SullivanStrickler 30b6	that portions of it contain hearsay, F.R.E. 802. Defendants object to this
	(Felicetti) Dep. Ex. 11 - Coffee County Exterior Surveillance Video still shots (Jan. 8)	exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
114	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 8 - Maggio 08122022-000034	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
115	SullivanStrickler - Log of IP addresses that have downloaded CC Data	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
116	Minute Sheet for proceedings held in Open Court, Pearson et. al v. Kemp et al, No. 1:20-cv- 04809-TCB (N.D. Ga. Dec. 7, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
117	Coffee County BOE 30b6	Defendants object to this
	(Stone) Dep. Ex. 7 – Coffee	exhibit because it is
	County Surveillance Video still	unauthenticated; Defendants
	shots of Jeffrey Lenberg (Jan.	object to this exhibit on the
	27-29)	basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
110		hearsay, F.R.E. 802.
118	Coffee County BOE 30b6	Defendants object to this
	(Stone) Dep. Ex. 8 - Coffee	exhibit because it is
	County Surveillance Video still	unauthenticated; Defendants
	shots of Jeffrey Lenberg &	object to this exhibit on the
	Doug Logan (Jan. 18-19)	basis of relevance, F.R.E. 401; Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
119	Lenberg Dep. Ex. 5 (Coffee County ICC & ICP Reports)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
120	Lenberg Dep. Ex. 10 (Misty Hampton preparing thumb drive for Jeffrey Lenberg)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
121	Jan. 7, 2023 Halderman Supplemental Decl. re Coffee County	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
122	Oct. 12, 2022 SOS 30b6	Defendants object to this
	(Sterling) Dep. Ex. 21 (email	exhibit because its attachment
	chain, dated July 27, 2022,	is unauthenticated and further
	between Bruce Brown and Josh	object because counsel is not
	Belifante)	competent to testify;
		Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
123	Oct. 12, 2022 SOS 30b6	Defendants object to this
	(Sterling) Dep. Ex. 18 (Mike	exhibit because its attachment
	Lindell Flight)	is unauthenticated and further
		object because counsel is not
		competent to testify;
		Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time, F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
124	Coffee County BOE 30b6 (Stone) Dep. Ex. 16 (Feb. 25, 2021 letter from Jil Ridlehoover to Coffee County BOE)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit as hearsay to the extent offered for its truth, F.R.E. 802.
125	Coffee County BOE 30b6 (Stone) Dep. Ex. 17 (Feb. 25, 2021 letter from Misty Hampton to Coffee County BOE)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit as hearsay to the extent offered for its truth, F.R.E. 802.
126	Excerpt of Ed Voyles production file, which contains a Feb. 24, 2021 text message thread between Ed Voyles and Misty Hampton	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit as hearsay to the extent offered for its truth, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
127	FORTALICE001658 - Feb. 26, 2021 Evidence Collection Protocol	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants further object on the basis of the confidentiality designation and stipulated protective order in this case
128	Ga. Sec'y of State, Raffensperger to Replace Coffee County Election Equipment, End Distraction for Local Election Officials (Sept. 23, 2022)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
129	Sept. 23, 2022 State Defendants Notice Regarding Coffee County Equipment	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
130	Coffee County Acceptance Testing Documents	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403

PX No.	Document Description	Defs.' Objection(s)
131	Intentionally Left Blank	
132	Email thread from Sept. 26, 2022 between David Cross, Bruce Brown, and Bryan Tyson	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802; Improper Opinion Testimony By Lay Witness, FRE 701; counsel not competent to testify
133	Jan. 16, 2023 Email from B. Tyson to R. Abney and C. Middleton	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
134	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 8 - Letter to GBI	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing,

PX No.	Document Description	Defs.' Objection(s)
		distracting, or a waste of time, F.R.E. 403
135	State Defendant's Brief re Investigative Privilege	Defendants object to this exhibit on the basis of relevance, F.R.E. 401
136	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 11 - SOS- INV000048	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
137	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 13 - SOS- INV000060	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
138	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 14 - SOS- INV000014	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

PX No. Document Description Defs.' Obje	ection(s)
139 SOS-INV000041 Defendants object	
exhibit on the base	
relevance, F.R.E.	· ·
Defendants furth	-
the exhibit on the	_
its reception wou	-
prejudicial, confu	
distracting, or a v	waste of time,
F.R.E. 403.	
140 Oct. 12, 2022 SOS 30b6 Defendant object	
(Sterling) Dep. Ex. 17 (Coffee exhibit because it	
County surveillance video still unauthenticated.	
shots) objects to this exl	
basis of relevance	*
Defendants furth	
the exhibit on the	_
its reception wou	•
prejudicial, confu	_
distracting, or a v	waste of time,
F.R.E. 403.	
141 SOS, Logan and Lenberg's Defendant object	
surveillance video still shots exhibit because it	
unauthenticated.	
objects to this exl	
basis of relevance	,
Defendants furth	-
the exhibit on the	-
its reception wou	•
prejudicial, confu	
distracting, or a v F.R.E. 403.	waste of time,
142 Sinners Dep. Ex. 5 - Harry Defendants object	t to this
MacDougald's 45-minute call exhibit on the base	
with Marilyn Marks relevance. F.R.E.	
Defendants object	,
exhibit to the ext	
constitutes hears	

PX No.	Document Description	Defs.' Objection(s)
143	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 29 - STATE- DEFENDANTS-00101937 (Dominion Notice to Counties)	
144	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 3 (password on post-it at the base of a monitor)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
145	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 7 - SOS- INV0000007	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
146	11Alive Staff, Questions raised in timeline of state response to Coffee County breach, 11Alive News (Sep. 26, 2022, 1:44 PM)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
147	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 6 - The Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022), YouTube (May 9, 2022)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
148	SOS-INV000144 (SEB case list)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
149	Ga. Sec'y of State, Secretary Raffensperger Calls on Department of Justice to Investigate Allegation of Fulton County Shredding Applications (Oct. 11, 2021)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
150	Feb. 24, 2022 SOS 30b6 (Sterling) Dep. Ex. 4 - Université de Genève (UNIGE), How to safeguard democracy? A look back at the last American presidential election. Gabriel Sterling, YouTube (Oct. 4, 2021, uploaded Nov. 25, 2021)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
151	August 2020 State Defs.' Opp.	
	to Curling Pls.' Preliminary	
	Injunction Motion	
152	ELECTIONS_00000091	Defendant objects to this
		exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit on the
		basis of relevance. FRE 401.
153	ELECTIONS_00000127	Defendant objects to this
		exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit on the
		basis of relevance. FRE 401.
154	ELECTIONS_00000194	Defendant objects to this
		exhibit because it constitutes
		hearsay. FRE 802. Defendant
		objects to this exhibit on the
		basis of relevance. FRE 401.
		Defendant objects to this
		exhibit because it is
		unauthenticated.
155	ELECTIONS_00000198	Defendant objects to this
		exhibit because it constitutes
		hearsay. FRE 802. Defendant
		objects to this exhibit on the
		basis of relevance. FRE 401.
		Defendant objects to this
		exhibit because it is
		unauthenticated.
156	ELECTIONS_00000189	Defendants object to this
		exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
157	Jan. 21, 2022 Fulton Cnty 30b6	Defendants object to this
	(Gilstrap) Dep. Tr. Ex. 7 -	exhibit on the basis of
	STATE-DEFENDANTS-	relevance. F.R.E. 401;
	00169113	Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403;
		Defendant objects to this
		exhibit because it constitutes
		hearsay. FRE 802.
158	Coffee County BOE 30b6	Defendant objects to this
	(Stone) Dep. Tr. Ex. 3 - Coffee	exhibit because it is
	County Surveillance Video Still	unauthenticated. Defendant
	Shots	objects to this exhibit on the
		basis of relevance. FRE 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403.
159	Updated January 7, 2021	Defendant objects to this
	Coffee County Surveillance	exhibit because it is
	Video Still Shots	unauthenticated. Defendant
		objects to this exhibit on the
		basis of relevance. FRE 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
100	Don Adido Trrittor (Ostobor 9	undue prejudice. F.R.E. 403.
160	Ben Adida Twitter (October 2,	Defendant objects to this
	2022) (HMPB + 1 BMD)	exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit on the
		basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
161	September 2018 Wenke Lee	Defendants object to this
	Presentation	exhibit because it is
		unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403.
162	SullivanStrickler 30b6	Defendants object to this
	(Felicetti) Dep. Ex. 19 - Maggio	exhibit because it is
	08122022-000098 (FedEx	unauthenticated; Defendants
	Shipping Requests & Labels)	object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
1.00		hearsay, F.R.E. 802.
163	Chaney Dep. Ex. 4—STATE-	Defendants object to this
	DEFENDANTS 0020100	exhibit on the basis of
	(SEB2020-250 Investigation	relevance, F.R.E. 401;
	Report)	Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing, distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
		115a15ay, 1.11.12. 002.

PX No.	Document Description	Defs.' Objection(s)
164	Lindsey Dep. Ex. 6 - The Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022), YouTube (May 9, 2022)	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
165	Georgia's 2022 Statewide Risk Limiting Audit Confirms Results _ Georgia Secretary of State (Feb. 10, 2023).	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
166	SullivanStrickler 30b6 (Felicetti) Dep. Ex. 12 - All Photos - Maggio 08122022- 000236 to 265	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
167	October 2022 State Defs.' Opp to Coalition Pls.' Emergency	

PX No.	Document Description	Defs.' Objection(s)
	Motion for Relief re Protective	
	Order	
168	July 20, 2022 Ryan Germany Email re Interview CC	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
169	February 2021 State Defs.' Brief re Standing	
170	August 2020 Fulton Cnty Opp. to Curling Pls.' Preliminary Injunction Motion	
171	November 2019 State Defs.' Reply ISO MTD Pls.' Amended Complaints	
172	October 2017 Fulton Cnty Defs.' Reply ISO Motion to Dismiss	
173	June 2022 Ex. A—December 2021 SEB Hearing Transcript- Coffee County Portion	

PX No.	Document Description	Defs.' Objection(s)
174	Andrew W. Appel et. al., Ballot-Marking Devices (BMDs) Cannot Assure the Will of the Voters, Election L. J., 20 (Feb. 14, 2020)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
175	Fulton Cnty Response to Coalition Pls 2nd RFA	
176	Email re 2nd follow-up requesting documents	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
177	August 2017 State Defs' Brief ISO MTD	
178	September 2022 State Defs.' Notice of Conditional Objection to September 9 Proceeding.	

PX No.	Document Description	Defs.' Objection(s)
PX No. 179	Greg Freemyer—Combined Posts	Defs.' Objection(s) Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain
180	Dec. 12, 2018 SAFE Commission Tr.	hearsay, F.R.E. 802. Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendant's further object to this exhibit as no line numbers or pages are used.
181	SOS-INV000053	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
182	SOS-INV000087	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
183	Monday, 11-16-20 19:24 UTC	Defendants object to this
	Message # 155, from Hampton,	exhibit because it is
	to Voyles, Subject: ORR	unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
184	4-25-22 Printout of Case Sheet	Defendants object to this
	for SEB2020-250-Coffee	exhibit on the basis of
	County Misc	relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
185	Coffee County surveillance	Defendants object to this
	video interior still shots (Jan.	exhibit because it is
	7) - 62 images	unauthenticated; Defendants
		object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403.
186	SOS-INV000103	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
105	D. H.: Ct. D. M.	hearsay, F.R.E. 802.
187	RollingStone: Pro-Trump	Defendants object to this
	Georgia Officials Plotted to	exhibit because it is
	Swipe Voting Data. We Caught	unauthenticated; Defendants
	Them.	object to this exhibit on the
		basis of relevance, F.R.E. 401; Defendants further object to
		the exhibit on the grounds that its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		_
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
PX No. 188	Oct. 12, 2022 SOS 30b6 (Sterling) Dep. Ex. 25 - Chris Harvey SOS Notice to Counties re ORR for election software	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain
189	SOS Press Release: Secretary of State's Office Opens Investigation into Coffee County's Handling of Recount	hearsay, F.R.E. 802. Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
190	10102022-000141	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
191	DOJ Ltr to Karen Fann	Defendants object to this
	(President of Arizona State	exhibit because it is
	Senate) re Maricopa County	unauthenticated; Defendants
	audit and Cyber Ninjas	object to this exhibit on the
		basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.
192	SOS Press Release: The	Defendants object to this
	MITRE Corporation, an	exhibit because it is
	Independent Federal Lab, finds	unauthenticated; Defendants
	Georgia Election System	object to this exhibit on the
	Secure	basis of relevance, F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would be unfairly
		prejudicial, confusing,
		distracting, or a waste of time,
		F.R.E. 403; Defendants object
		to this exhibit on the grounds
		that portions of it contain
		hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
193	Executive Summary - July 2022 MITRE Report	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
194	Email chain with Michael Barnes, Blake Evans, and others	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
195	Gabe Sterling LinkedIn	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
196	Excerpted pages of "Integrity Counts" by Brad Raffensperger	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
197	Nov. 23, 2021 State Defs.' Responses to Curling Pls.' Requests for Admission	
198	STATE-DEFENDANTS- 00113751	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
199	STATE-DEFENDANTS- 00169353	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds

PX No.	Document Description	Defs.' Objection(s)
		that portions of it contain hearsay, F.R.E. 802.
200	STATE- DEFENDANTS- 00192602	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Defendants object to this exhibit on the grounds that portions of it contain hearsay, F.R.E. 802.
201	Audio Recording - Scott Hall	Defendant objects to this exhibit because it constitutes hearsay. FRE 802. Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant objects to this exhibit because it is unauthenticated.
202	STATE-DEFENDANTS- 11151729	Defendant objects to this exhibit on the basis of relevance. FRE 401.
203	Dominion Voting brochure re: Mobile ballot printing	Defendant objects to this exhibit on the basis of relevance. FRE 401. Defendant objects to this exhibit because it is unauthenticated.

PX No.	Document Description	Defs.' Objection(s)
204	Ga. Code Ann. § 21-2-498.	Defendant objects to this
	Precertification tabulation	exhibit on the basis of
	audits; rules and regulations;	relevance. FRE 401. Defendant
	risk-limiting audit pilot	objects to this exhibit because
	program	it is unauthenticated.
205	Rule 183-1-1504 Audit	Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401. Defendant
		objects to this exhibit because
		it is unauthenticated.
206	Arlo instructions re ballot	Defendant objects to this
	manifest	exhibit because it is
		unauthenticated.
207	CGG06SterlingDeKalbBatchSh	
	eetsListOfficialArlowithCGGtot	
	al_XLS.xlsx	
208	Kemp Ltr to SEB re analysis of	Defendant objects to this
	inconsistencies with Fulton	exhibit because it is
	County 2020 Risk-Limiting	unauthenticated. Defendant
	Audit Report (RLA)	objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401.
209	DeKalb County Audit Board	Defendant objects to this
	Batch Sheet 0262	exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
212		relevance. FRE 401.
210	DeKalb County Audit Board	Defendant objects to this
	Batch Sheet 0260	exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this

PX No.	Document Description	Defs.' Objection(s)
		exhibit on the basis of relevance. FRE 401.
211	DeKalb County Audit Board Batch Sheet 0140	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
212	DeKalb County Audit Board Batch Sheet 0117	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
213	DeKalb County Audit Board Batch Sheet 0104	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
214	Senator Walker & Rep. Blackmon Ltr to SEB re Kemp's report re 2020 Risk- Limiting Audit Report	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
215	Fox5Atlanta: Software glitch causes delay counting thousands of votes in Gwinnett County	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
216	Whittier Daily News: A behind the scenes look at Georgia's vote-counting	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
217	Defendants Secretary of State Brad Raffensperger, State Election Board, and State Election Board Members' Response to Order Dated April 16, 2019	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401.
218	CGG's ORR to Jeff Milsteen, KSU (190pgs of material)	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
219	Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 12.4 Challenge Board	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401.
220	Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 2.3 Deleting a Database	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
221	Ballot image printout from GEMS computer	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
222	Ballot image report from a GEMS computer	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
223	Handwritten note about Fulton precinct	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
224	Direct Record Electronic Voting Machine Recap records	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
225	Photo of machine serial numbers of DRE machines	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
226	USA vs. Netyksho, et al.	Defendant objects to this
	Indictment	exhibit on the basis of
		relevance. FRE 401. Defendant
		also objects to this exhibit on
		the grounds that it would cause
		undue prejudice and confuse
		the issues in the case. FRE 403.
227	Russian Targeting of Election	Defendant objects to this
	Infrastructure During the 2016	exhibit because it is
	Election: Summary of Initial	unauthenticated. Defendant
	Findings and	objects to this exhibit because
	Recommendations, May 8, 2018	it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401. Defendant
		also objects to this exhibit on
		the grounds that it would cause
		undue prejudice and confuse
		the issues in the case. FRE 403.
228	"Who, What, Why" article titled	Defendant objects to this
	"Kemp's Aggressive Gambit to	exhibit because it is
	Distract from Election Security	unauthenticated. Defendant
	Crisis."	objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401. Defendant
		also objects to this exhibit on
		the grounds that it would cause
		undue prejudice and confuse
		the issues in the case. FRE 403.

PX No.	Document Description	Defs.' Objection(s)
229	SOS Press Release: After	Defendant objects to this
	Failed Hacking Attempt SOS	exhibit because it is
	Launches Investigation into	unauthenticated. Defendant
	Georgia Democratic Party	objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401. Defendant
		also objects to this exhibit on
		the grounds that it would cause
		undue prejudice and confuse
		the issues in the case. FRE 403.
230	Michael Barnes LinkedIn	Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401.
231	Michael Barnes LinkedIn	Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401.
232	Dominion017810	Defendant objects to this
		exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401.
233	STATE-DEFENDANTS-	Defendant objects to this
	00157766	exhibit because it constitutes
		hearsay. FRE 801. Defendant
		objects to this exhibit on the
22.4		basis of relevance. FRE 401.
234	STATE-DEFENDANTS-	Defendant objects to this
	00158494	exhibit because it constitutes
		hearsay. FRE 801. Defendant
		objects to this exhibit on the
		basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
235	STATE-DEFENDANTS-	Defendant objects to this
	00157783	exhibit because it constitutes
		hearsay. FRE 801. Defendant
		objects to this exhibit on the
		basis of relevance. FRE 401.
236	Dominion042072	Defendant objects to this
		exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401.
237	Dominion042114	Defendant objects to this
		exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401.
238	Dominion042575	Defendant objects to this
		exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401.
239	Dominion042641	Defendant objects to this
		exhibit because it is
		unauthenticated. Defendant
		objects to this exhibit because
		it constitutes hearsay. FRE
		801. Defendant objects to this
		exhibit on the basis of
		relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
240	Dominion042793	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
241	Dominion043491	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
242	Dominion043648	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
243	Dominion043765	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
244	Aug. 4, 2020 Email Chain from Rick Barron	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.

PX No.	Document Description	Defs.' Objection(s)
245	STATE-DEFENDANTS- 00161074	Defendant objects to this exhibit on the basis of relevance. FRE 401.
246	STATE-DEFENDANTS- 00127945	Defendant objects to this exhibit on the basis of relevance. FRE 401.
247	Dominion069731	Defendant objects to this exhibit because it is unauthenticated. Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this exhibit on the basis of relevance. FRE 401.
248	Chris Harvey LinkedIn	Defendant objects to this exhibit on the basis of relevance. FRE 401.
249	STATE-DEFENDANTS- 00108321	Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this evidence on the basis that it would cause undue prejudice. FRE 403
250	STATE-DEFENDANTS- 00108787	Defendant objects to this exhibit because it constitutes hearsay. FRE 801. Defendant objects to this evidence on the basis that it would cause undue prejudice. FRE 403

PX No.	Document Description	Defs.' Objection(s)
251	STATE-DEFENDANTS-	Defendants object to this
	00110230	exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403;
		Defendants further object to
		this exhibit to the extent it or
		portions thereof constitute
		hearsay. F.R.E. 802.
252	STATE-DEFENDANTS-	Defendants object to this
	00115480	exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403.
253	STATE-DEFENDANTS-	Defendants object to this
	00117430	exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403.
254	FORTALICE001209	Defendants object to this
		exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403;
		Defendants further object to
		this exhibit to the extent it or
		portions thereof constitute
		hearsay. F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
255	Dominion069648	Defendants object to this
		exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403.
256	Dominion072216	Defendants object to this
		exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403;
		Defendants further object to
		this exhibit to the extent it or
		portions thereof constitute
		hearsay. F.R.E. 802.
257	Dominion074766	Defendants object to this
		exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
272	7	undue prejudice. F.R.E. 403.
258	Dominion074784	Defendants object to this
		exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
050	D'' 076006	undue prejudice. F.R.E. 403.
259	Dominion076086	Defendants object to this
		exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		this exhibit to the extent it or
		portions thereof constitute
		hearsay. F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
260	STATE-DEFENDANTS- 00200997	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
261	STATE-DEFENDANTS-00165630	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
262	§ 21-2-379.22	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
263	Photo by Chris Aluka Berry (Reuters) "People cast their ballots during early voting for the presidential elections at State Farm Arena in Atlanta, Ga., October 12, 2020"	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
264	Secure the Vote: Precinct Layout to Aid with Privacy Training	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
265	Dec. 1, 2020 - Chris Harvey Official Election Bulletin re "Preserving Ballot Images and Delivering to Sec. of State"	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
266	Excerpt of Rockdale000924 (with highlighting added)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
267	Curling Plaintiffs' Third Amended Notice of Deposition of Fulton County Defendants	
268	E-mail string from Scott Tucker to Blake Evans re Two ballots printing	Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
269	E-mail string from Chris Harvey to Richard Barron re Fulton County - Machines Down and Polling Places Not Open	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
270	E-mail string from Blake Evans to Richard Barron & others re Elections complaint from Thomas Elliott	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
271	E-mail string from Richard Barron to Brigitte Bailey, Gabriel Sterling and Dwight Brower re Fulton Advance Voting Issue	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
272	E-mail string from Richard Barron to Julie Houk and Ryan Germany re Urgent demands to send corrected absentee ballots to Fulton Co. Voters	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to this exhibit to the extent it or portions thereof constitute hearsay. F.R.E. 802.
273	12-14-18, E-mail from Richard Barron to list re Voting system input from Fulton County, and 1-3-19 E-mail from Joseph Kirk to list re My thoughts about our next voting system	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
274	E-mail string from Gabriel Sterling to Chris Harvey re Fulton County ExpressPolls	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
275	Seven Hills Strategies report re State Election Board	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
276	Seven Hills Strategies report re State Election Board - Post- Election Executive Summary	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
277	Merritt Beaver LinkedIn	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
278	Email chain re action items for the Air Gap Elections Center Network	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
279	Email chain re Dominion tech on the Gwinnett video used a flash drive on a laptop connected to E-Net	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
280	Information Technology Security Program Charter	Defendants object to this exhibit because it is unauthenticated; Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
281	July 2020 Email re Statement of Work & Rules of Engagement with Fortalice	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
282	Email chain re threat "I bet I can hack your electronic voting machines."	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802.
283	Email from Dave Hamilton to Merritt Beaver re Risk Register and attaching "SOS - Remediation Task List v13.1.xlsx"	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
284	SOS - Remediation Task List v13.1.xlsx	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802.
285	Alert re ransomware infection affecting Jekyll Island Authority	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802.
286	July 10, 2020 Rules of Engagement (Fortalice & GA SOS)	
287	Email chain from Dave Hamilton re TeamViewer	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
288	Email chain re BMDs not reading the cards	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
289	Email chain between IT department and Civix re Latest Version of Open Issues Tracking	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
290	Email chain re security vulnerabilities identified in PCC scan from Fortalice	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
291	Email chain re Election Center - Infrastructure Server - Proposed changes	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
292	FORTALICE003625 (Aug. 25, 2020 Draft Technical Assessment (15 pgs))	Defendants object to this exhibit because it is unauthenticated; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
293	FORTALICE003678 (Aug. 25, 2020 Draft Technical Assessment (14 pgs))	Defendants object to this exhibit because it is unauthenticated; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
294	FORTALICE000650 (Nov. 25, 2020 Fulton County Laptop Forensic Review)	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants object to this exhibit because it is unauthenticated; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.
295	Curling Plaintiffs' Fifth Amended Notice of Deposition of Office of the Secretary of State	
296	David Hamilton LinkedIn	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
297	Email from Logan Lamb to Merle King, later forwarded to Michael Barnes re KSU server	Defendants object to this exhibit on the basis of relevance. F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403; Defendants further object to this exhibit to the extent it constitutes hearsay. F.R.E. 802.
298	Fortalice Task Order re Incident Response Support	Defendants object to this exhibit on the basis of relevance. F.R.E. 401.
299	Fortalice Status Updates	Defendants object to this exhibit because it is unauthenticated; Defendants further object to the exhibit on the grounds that its reception would cause undue prejudice. F.R.E. 403.

PX No.	Document Description	Defs.' Objection(s)
300	Email from Dave Hamilton re	Defendants object to this
	Potential leakage of voter data	exhibit on the basis of
		relevance. F.R.E. 401;
		Defendants further object to
		the exhibit on the grounds that
		its reception would cause
		undue prejudice. F.R.E. 403;
		Defendants further object to
		this exhibit to the extent it
		constitutes hearsay. F.R.E.
201	CDC Atlanta antiala HIIDDATE	802.
301	CBS Atlanta article "UPDATE:	Defendants object to this exhibit on the basis of
	Ransomeware Attackers Hit	
	Hall County Election Infrastructure"	relevance, F.R.E. 401. Defendants object to this
	imiastructure	exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
302	Email chain re Election Center	
	Visit Notes and enclosing "SOS	
	- Site Visit.docx"	
303	SOS - Site Visit.docx	
304	Email from Dave Hamilton re	
	encryption	
305	Email chain re CyberSecurity	
	Incident Response Plan	
306	Curling Pls Doc Subpoena to	Defendants object to this
	Eric Chaney	exhibit on the basis of
		relevance, F.R.E. 401.
307	Coalition Pls Doc Subpoena to	Defendants object to this
	Eric Chaney	exhibit on the basis of
		relevance, F.R.E. 401.
308	Chaney Response to Coalition	Defendants object to this
	Pls Doc Subpoena	exhibit on the basis of
		relevance, F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
309	Dec. 10, 2020 Letter to House	
	Governmental Affairs	Defendants object to this
	Committee	exhibit as hearsay, F.R.E. 802.
310	Email chain with Emma Brown	
	(WaPo), Jennifer Herzog & Eric	
	Chaney denying Coffee County	Defendants object to this
	breach	exhibit as hearsay, F.R.E. 802.
311	Robert A. Sinners LinkedIn	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
312	Shawn Still v. Raffensperger	Defendants object to this
	Complaint	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
010		exhibit as hearsay, F.R.E. 802.
313	"TLP: White" Version of CISA's	
	ICS advisory, U.S. Dep't of	
	Homeland Security,	
	Cybersecurity & Infrastructure	D 6 1 4 1: 44 41:
	Security Agency,	Defendants object to this
	Vulnerabilities Affecting	exhibit as more prejudicial
	Dominion Voting Systems	than probative, F.R.E. 403.
	ImageCast X, ICS Advisory No.	Defendants object to this
314	ICSA-22-154-01 (June 3, 2022) "TLP: Red" Version of CISA's	exhibit as hearsay, F.R.E. 802.
014	ICS advisory, U.S. Dep't of	
	Homeland Security,	
	Cybersecurity & Infrastructure	
	Security Agency,	
	Vulnerabilities Affecting	Defendants object to this
	Dominion Voting Systems	exhibit as more prejudicial
	ImageCast X, ICS Advisory No.	than probative, F.R.E. 403.
	ICSA-22-XXX-0X (STATE-	Defendants object to this
	DEFENDANTS-00202234-38)	exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
315	Letter enclosing BC0001-0008	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
316	Mark Niesse, Pro-Trump tech	Defendants object to this
	team copied Georgia election	exhibit on the basis of
	data, record show, Atlanta-	relevance, F.R.E.
	Journal Constitution	401.Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E.
		403.Defendants object to this
317	Coffee County BOE 30b6	exhibit as hearsay, F.R.E. 802.
317	(Stone) Dep. Ex. 2 – Coffee	
	County Surveillance Video still	Defendants object to this
	shots of Eric Chaney (Jan. 7 &	exhibit on the basis of
	8)	relevance, F.R.E. 401.
318	Collection of CC BOE Monthly	Defendants object to this
	Board Meeting Minutes (25	exhibit on the basis of
	pgs)	relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
319	Eric Chaney Resignation from	Defendants object to this
	CC BOE	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
320	Emails re Misty Hampton's	
	ORR request for the	
	surveillance videos &	Defendants object to this
	timesheets	exhibit on the basis of
		relevance, F.R.E. 401.
321	SullivanStrickler Engagement	
	Agreement with Jesse Binnall	
	("subsequent work in the State	
	of Georgia"	
		Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
322	Dominion089393	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
323	Declaration of Jeffrey E.	Defendants object to this
	Lenberg re Election Integrity	exhibit on the basis of
	Investigations August 2020	relevance, F.R.E. 401.
	through October 2022	Defendants object to this
	_	exhibit as hearsay, F.R.E. 802.
324	"Coffee_Messages.pdf"	Defendants object to this
	produced by Doug Logan on	exhibit as more prejudicial
	11/10/22	than probative, F.R.E.
		403.Defendants object to this
		exhibit as hearsay, F.R.E. 802.
325	"12. Coffee & Pierce Cty	
	Records Requests.pdf"	Defendants object to this
	produced by Jeffrey Lenberg on	exhibit on the basis of
	11/19/22	relevance, F.R.E. 401.
326	Jan 27 & 29, 2021 Lenberg	Defendants object to this
	surveillance video still shots (re	exhibit on the basis of
	ring light)	relevance, F.R.E. 401.
327		1
		relevance, F.R.E. 401.
328	_	
	9	
220		exhibit as hearsay, F.R.E. 802.
329		Defendants object to this
	, ,	I
000		-
330		1
	pages total) 	
321	Jan 7 surveillance video still	-
991		I
	1	
326 327 328 329 330	surveillance video still shots (re	exhibit on the basis of

PX No.	Document Description	Defs.' Objection(s)
332	Jan 7 surveillance video still	Defendants object to this
	shot (interior) - 8 images	exhibit on the basis of
		relevance, F.R.E. 401.
333	DouglasNow Article "Board of	Defendants object to this
	Elections accepts employee	exhibit on the basis of
	resignations, election office	relevance, F.R.E. 401.
	temporarily closed"	Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
334	Stillshot of Jil Ridlehoover in	
	DouglasNow "Dominion Voting	Defendants object to this
	Machine Flaws" YouTube	exhibit on the basis of
	Video 2	relevance, F.R.E. 401.
335	Stillshot of Ed Voyles, Wendell	
	Stone, and Diana (Misty's	
	daughter) in DouglasNow	Defendants object to this
	"Dominion Voting Machine	exhibit on the basis of
	Flaws" YouTube Video 2	relevance, F.R.E. 401.
336	Stillshot of Matthew	
	McCullough in DouglasNow	Defendants object to this
	"Dominion Voting Machine	exhibit on the basis of
225	Flaws" YouTube Video 2	relevance, F.R.E. 401.
337	CES Memos to Coffee County	Defendants object to this
	enclosing EMS passwords for	exhibit on the basis of
	elections (as copied by	relevance, F.R.E. 401.
	SullivanStrickler team)	Defendants object to this
		exhibit as more prejudicial
220	Toyt Magagaga produced by	than probative, F.R.E. 403.
338	Text Messages produced by Doug Logan re Coffee County	Defendants object to this exhibit on the basis of
		relevance, F.R.E.
	trip	401.Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E.
		403.Defendants object to this
		exhibit as hearsay, F.R.E. 802.
		exmon as nearsay, r.h.e. 802.

PX No.	Document Description	Defs.' Objection(s)
339	Excerpt of SullivanStrickler -	Defendants object to this
	Log of email addresses that	exhibit on the basis of
	have access to CC Data	relevance, F.R.E. 401.
		Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E. 403.
340	Screenshot from drive produced	Defendants object to this
	by Doug Logan (screenshot	exhibit on the basis of
	created by CGG expert)	relevance, F.R.E. 401.
		Defendants object to this
0.41		exhibit as hearsay, F.R.E. 802.
341	Headshot of Jennifer Jackson	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
342	Headshot of Karuna Naik	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
343	Headshot of Paul Maggio	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
344	SullivanStrickler Engagement	Defendants object to this
	Agreement with Sidney Powell	exhibit on the basis of
	(Michigan work)	relevance, F.R.E. 401.
345	Text Messages produced by	Defendants object to this
	Paul Maggio (one with Cathy	exhibit on the basis of
	Latham, one with Scott Hall)	relevance, F.R.E. 401.
346	Folder Tree of data produced by	
	SullivanStrickler "SSA1722	
	HARD DRIVE CONTENTS"	
0.1=	(doc created by K&H)	
347	Email from Jennifer Jackson to	
	Paul Maggio, Greg Freemyer,	
	and Karuna Naik enclosing	
940	"SSA 1722 Coffee County.xlsx"	
348	SSA 1722 Coffee County.xlsx	

PX No.	Document Description	Defs.' Objection(s)
349	Defending the Republic, Inc.	3 ()
	check made out to	Defendants object to this
	SullivanStrickler for	exhibit on the basis of
	\$26,220.64"	relevance, F.R.E. 401.
350	Email chain (Favorito, Voyles,	Defendants object to this
	Hampton, Latham, Marks)	exhibit on the basis of
	forwarding Chris Harvey SOS	relevance, F.R.E. 401.
	Notice to Counties re ORR for	Defendants object to this
	election software	exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
351	Jan 7 Surveillance video still	Defendants object to this
	shots (with Ed Voyles)	exhibit on the basis of
		relevance, F.R.E. 401.
352	Jan 7 Surveillance video still	Defendants object to this
	shots (Ed Voyles carrying in	exhibit on the basis of
	scanner)	relevance, F.R.E. 401.
353	March 8-9, 2021 Marilyn	Defendants object to this
	Marks text messages with Ed	exhibit on the basis of
	Voyles	relevance, F.R.E. 401.
		Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
354	Curling Pls' Subpoena to	Defendants object to this
	Latham	exhibit on the basis of
		relevance, F.R.E. 401.
355	CGG Subpoena to Latham and	Defendants object to this
	Ex. 1 (Draft Executive Orders -	exhibit on the basis of
	Dec 16 & 17 versions)	relevance, F.R.E. 401.
356	Dec. 23, 2020 Dominion's	Defendants object to this
	Notice of Obligation to Preserve	exhibit on the basis of
	Documents to Cathy Latham	relevance, F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
357	Draft Executive Order	Defendants object to this
	"Presidential Findings to	exhibit on the basis of
	Preserve Collect and Analyze	relevance, F.R.E. 401.
	National Security Information	Defendants object to this
	Regarding the 2020 General	exhibit as more prejudicial
	Election	than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
358	Jan. 6, 2021 Email from Misty	Defendants object to this
	Hampton to Scott Hall	exhibit on the basis of
	enclosing "ICC LOG.txt" and	relevance, F.R.E. 401.
	"slog.txt"; Scott Hall forwards	Defendants object to this
	to "x0250r0ll@protonmail.com	exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
359	Jan. 7 Surveillance video still	Defendants object to this
	shots of Alex Cruce	exhibit on the basis of
		relevance, F.R.E. 401.
360	Article entitled "Why computer	Defendants object to this
	scientists prefer paper ballots"	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
361	Gilbert Twitter	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
0.00	N 0 2010 F	exhibit as hearsay, F.R.E. 802.
362	Nov. 8, 2019 Engagement	Defendants object to this
	Letter between GA SOS & SEB	exhibit on the basis of
	and Dr. Juan Gilbert	relevance, F.R.E. 401.

PX No.	Document Description	Defs.' Objection(s)
363	Excerpt of Gusciora v. Corzine,	Defendants object to this
	Mar. 24, 2009 Trial Tr. (Dr.	exhibit on the basis of
	Shamos)	relevance, F.R.E. 401.
		Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
364	Donna Curling ENET Report	Defendants object to this
	(Redacted)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
365	Donna Price ENET Report	Defendants object to this
	(Redacted)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
366	Jeffrey Schoenberg ENET	Defendants object to this
	Report (Redacted)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
0.05	C. I. A.I DNDM	exhibit as hearsay, F.R.E. 802.
367	Schoenberg Absentee ENET	Defendants object to this
	Report	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
9.00	I D' ENIEM D	exhibit as hearsay, F.R.E. 802.
368	Laura Digges ENET Report	Defendants object to this
	(Redacted)	exhibit on the basis of
		relevance, F.R.E.
		401.Defendants object to this
369	William Diggas ENET Parant	exhibit as hearsay, F.R.E. 802.
508	William Digges ENET Report (Redacted)	Defendants object to this exhibit on the basis of
	(1veuacieu)	relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
		exhibit as hearsay, F.R.E. 602.

PX No.	Document Description	Defs.' Objection(s)
370	Ricardo Davis ENET Report (Redacted)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
371	Megan Missett ENET Report (Redacted)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
372	Redacted GBI Report	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
373	S. Ellis letter to V. Reynolds, "Request for Assistance in Investigation," Aug. 2, 2022	
374	R. Germany email to S. Ellis, S. Koth, re: meeting with GBI Agents, Aug. 17, 2022.	
375	S. Ellis email to J. Herzog, A. Rowell, R. Germany re: Coffee County SEB Investigation, July 21, 2022.	
376	SOS-INV000010	
377	SOS-INV000084	
378	W. Stone email to S. Koth re: "Coffee County Elections Investigation", June 7, 2023	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.
379	Stephanie Texts 06-03- forward.pdf - AZ Senate shared in their "Reading Room" [https://web.tresorit.com/l/XMN 4J#pqSHHqcq_c_eP90cdWcdSg], in the folder "2023-07-26 Uploads".	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
380	June 9, 2020 – Presidential	
	Preference Primary – General	
	Primary – Nonpartisan	
	General Election – Special	
	Election:	
	https://results.enr.clarityelectio	
	ns.com//GA//103613/256509/rep	
	orts/summary.zip(obtained	
	from	
	https://results.enr.clarityelectio	
	ns.com/GA/103613/web.255599/	
	#/summary)	
381	November 3, 2020 - General	
	Election:	
	https://results.enr.clarityelectio	
	ns.com//GA//105369/271927/rep	
	orts/summary.zip	
	(obtained from	
	https://results.enr.clarityelectio	
	ns.com/GA/105369/web.264614/	
000	#/summary)	
382	January 5, 2021 – Federal	
	Runoff:	
	https://results.enr.clarityelectio	
	ns.com//GA//107556/275242/rep	
	orts/summary.zip (obtained from	
	https://results.enr.clarityelectio	
	ns.com/GA/107556/web.274956/	
	#/summary)	
383	May 24 2022 – General	
909	Primary/Special Election:	
	https://results.enr.clarityelectio	
	ns.com//GA//113667/294374/rep	
	orts/summary.zip	
	(obtained from	
	https://results.enr.clarityelectio	
	ns.com/GA/113667/web.285569/	
	#/summary)	

PX No.	Document Description	Defs.' Objection(s)
384	November 8, 2022 – General/Special Election: https://results.enr.clarityelections.com//GA//115465/314082/reports/summary.zip(obtained fromhttps://results.enr.clarityelectio	
385	ns.com/GA/115465/web.307039/ #/summary) Fayette ballot from Discovery 00010_00000_052768	
386	Dominion Voting, Democracy Suite Windows Build Document	
387	EAC Certification	
388	Emergency ballot exhibit with hand-marking	
389	Charles Stewart III & Stephen Ansolabehere, Waiting to Vote, 14 Election L. J. 47 (2015)	Defendants object to this exhibit on the basis of relevance, F.R.E. 401.Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403.Defendants object to this exhibit as hearsay, F.R.E. 802.
390	William A. Edelstein & Arthur D. Edelstein, Queuing and Elections: Long Lines, DREs and Paper Ballots, as presented at the 2010 Electronic Voting Technology Workshop/Workshop on Trustworthy Elections, in Washington, D.C., Aug. 9-10, 2010.	Defendants object to this exhibit on the basis of relevance, F.R.E. 401. Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403. Defendants object to this exhibit as hearsay, F.R.E. 802.
391	Gilbert Demonstrative: Spreadsheet Example	

PX No.	Document Description	Defs.' Objection(s)
392	Dominion043404	Defendants object to this exhibit as hearsay, F.R.E. 802.
393	Dominion043477	Defendants object to this exhibit as hearsay, F.R.E. 802.
394	Pro V&V 5.5A GA	
395	Stark Demonstrative: Georgia Attorney General Contest, 2018	
396	Fulton games	
397	Cherokee Xbox games	
398	Application log gap	
399	Uncounted ICC ballots (Excerpt of Dkt. No. 809-5, Marks Declaration)	
400	Fulton County ballot examples	
401	Ballot 28 different results	
402	Adjudicated image 11.59.32	
403	Blank Ballot Dufort	
404	Russian Targeting of Election Infrastructure	Defendants object to this exhibit as more prejudicial than probative, F.R.E. 403.Defendants object to this exhibit as hearsay, F.R.E. 802.
405	Mar. 1, 2017 Email Chain discussing KSU Breach	
406	March 3, 2017 KSU memo re Election-related files	
407	Aug. 1, 2018 Chris Harvey Bulletin to election officials re CGG communication	

PX No.	Document Description	Defs.' Objection(s)
408	Fortalice Interview Questions	Defendants object to this
	·	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
409	Fortalice Interview Notes	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as more prejudicial
		than probative, F.R.E. 403.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
410	Exhibits to Aug. 11, 2017	Defendants object to this
	Declaration of Chris Harvey	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
411	Declaration of Michael Shamos,	Defendants object to this
	Ph.D., J.D.	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
412	Exhibit A to Declaration of	Defendants object to this
	Michael Shamos, Ph.D., J.D.	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
413	Affidavit of Nathan D. Woods	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
414	Appendices A & B to Affidavit	Defendants object to this
	of Nathan D. Woods	exhibit on the basis of
		relevance, F.R.E.
		401.Defendants object to this
		exhibit as hearsay, F.R.E. 802.
415	Exhibits 1 & 2 to Declaration of	Defendants object to this
	David D. Cross	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
416	Affidavit of Nathan D. Woods	Defendants object to this
		exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
41.77	A 1: A 0 D 1 A CC: 1 :1	exhibit as hearsay, F.R.E. 802.
417	Appendices A & B to Affidavit	Defendants object to this
	of Nathan D. Woods	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
418	Exhibit 1 to Aug 20 2020	exhibit as hearsay, F.R.E. 802.
410	Exhibit 1 to Aug. 28, 2020 Declaration of Chris Harvey	Defendants object to this exhibit on the basis of
	Declaration of Chiris Harvey	relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
419	STATE-DEFENDANTS-	Defendants object to this
	00048065 (Exhibits to Sept. 1,	exhibit on the basis of
	2020 Declaration of David D.	relevance, F.R.E. 401.
	Cross)	Defendants object to this
		exhibit as hearsay, F.R.E. 802.
420	STATE-DEFENDANTS-	Defendants object to this
	00048066 (Exhibits to Sept. 1,	exhibit on the basis of
	2020 Declaration of David D.	relevance, F.R.E. 401.
	Cross)	Defendants object to this
		exhibit as hearsay, F.R.E. 802.
421	STATE-DEFENDANTS-	Defendants object to this
	00048068 (Exhibits to Sept. 1,	exhibit on the basis of
	2020 Declaration of David D.	relevance, F.R.E. 401.
	Cross)	Defendants object to this
		exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
422	STATE-DEFENDANTS-	Defendants object to this
	00048069 (Exhibits to Sept. 1,	exhibit on the basis of
	2020 Declaration of David D.	relevance, F.R.E. 401.
	Cross)	Defendants object to this
		exhibit as hearsay, F.R.E. 802.
423	STATE-DEFENDANTS-	Defendants object to this
	00048070 (Exhibits to Sept. 1,	exhibit on the basis of
	2020 Declaration of David D.	relevance, F.R.E. 401.
	Cross)	Defendants object to this
10.1		exhibit as hearsay, F.R.E. 802.
424	2021.06.28 - Expert Report of	
407	Andrew W. Appel	
425	2021.07.01 - [AEO] Expert	
	Report of Prof. J. Alex	
400	Halderman	
426	Exhibits to 2021.07.01 - [AEO]	
	Expert Report of Prof. J. Alex Halderman	
427	Declaration of Duncan Buell	Defendants object to this
421	(Aug. 7, 2018)	exhibit on the basis of
	(Aug. 1, 2010)	relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
428	Exhibits to Declaration of	Defendants object to this
120	Duncan Buell (Aug. 7, 2018)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
429	Declaration of Duncan Buell	Defendants object to this
	(June 29, 2017)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
430	Declaration of Harri Hursti	Defendants object to this
	(Sept. 1, 2020)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
431	Declaration of Harri Hursti	Defendants object to this
	(Dec 16, 2019)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
432	Declaration of Harri Hursti	Defendants object to this
	(Aug. 21, 2020)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
433	Exhibit A to Declaration of	Defendants object to this
	Harri Hursti (Aug. 21, 2020)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
434	Declaration of Harri Hursti	Defendants object to this
	(Aug. 24, 2020)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
105		exhibit as hearsay, F.R.E. 802.
435	Exhibits to Declaration of	Defendants object to this
	Harri Hursti (Aug. 24, 2020)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
400	Dedent's efficient Heat'	exhibit as hearsay, F.R.E. 802.
436	Declaration of Harri Hursti	Defendants object to this
	(Sept. 28, 2020)	exhibit on the basis of
		relevance, F.R.E.
		401.Defendants object to this
437	Declaration of Harri Hursti	exhibit as hearsay, F.R.E. 802.
407	(Oct. 4, 2020)	Defendants object to this exhibit on the basis of
	(Oct. 4, 2020)	relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
438	Declaration of Harri Hursti	Defendants object to this
400	(Oct. 26, 2020)	exhibit on the basis of
	(000. 20, 2020)	relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
		cambit as incarsay, F.It.E. 002.

PX No.	Document Description	Defs.' Objection(s)
439	Exhibits to Declaration of	Defendants object to this
	Harri Hursti (Oct. 26, 2020)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
440	Declaration of Logan Lamb	Defendants object to this
	(June 30, 2017)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
441	Declaration of Logan Lamb	Defendants object to this
	(Aug. 3, 2018)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
442	Exhibits to Declaration of	Defendants object to this
	Logan Lamb (Aug. 3, 2018)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
443	Declaration of Logan Lamb	Defendants object to this
	(Jan. 14, 2020)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
444	Declaration of Kevin Skoglund	Defendants object to this
	(Oct. 22, 2019)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
4.45	A	exhibit as hearsay, F.R.E. 802.
445	Attachments to Declaration of	Defendants object to this
	Kevin Skoglund (Oct. 22, 2019)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
110	Declaration of Karrin Classics d	exhibit as hearsay, F.R.E. 802.
446	Declaration of Kevin Skoglund	Defendants object to this
	(Sept. 29, 2020)	exhibit on the basis of
		relevance, F.R.E.
		401.Defendants object to this
		exhibit as hearsay, F.R.E. 802.

PX No.	Document Description	Defs.' Objection(s)
447	Declaration of Kevin Skoglund	Defendants object to this
	(Oct. 4, 2020)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
448	Declaration of Philip B. Stark	Defendants object to this
	(Sept. 9, 2018)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
449	Attachments to Declaration of	Defendants object to this
	Philip B. Stark (Sept. 9, 2018)	exhibit on the basis of
		relevance, F.R.E. 401.
		Defendants object to this
		exhibit as hearsay, F.R.E. 802.
450	Declaration of Philip B. Stark	Hearsay (FRE 802/803),
	(Sept. 30, 2018)	Relevance (FRE 401), Improper
		Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative
		Value (FRE 401)
451	Declaration of Philip B. Stark	Hearsay (FRE 802/803),
	(Oct. 22, 2019)	Relevance (FRE 401), Improper
		Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative
450	A., 1	Value (FRE 401)
452	Attachments to Declaration of	Lack of Foundation (FRE 901),
	Philip B. Stark (Oct. 22, 2019)	Hearsay (FRE 802/803),
		Relevance (FRE 401)
453	Declaration of Philip B. Stark	Hearsay (FRE 802/803),
	(Dec. 16, 2019)	Relevance (FRE 401), Improper
		Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative
		Value (FRE 401)

Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401) Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401) Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)	PX No.	Document Description	Defs.' Objection(s)
Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401) 455 Declaration of Philip B. Stark (Aug. 31, 2020) Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401) 456 Declaration of Philip B. Stark (Sept. 13, 2020) Hearsay (FRE 802/803), Relevance (FRE 401) 457 Declaration of Juan Gilbert 458 Declaration of Dr. Benjamin Adida (Aug. 28, 2020) Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401) 459 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)	454	Declaration of Philip B. Stark	Hearsay (FRE 802/803),
Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401) 455 Declaration of Philip B. Stark (Aug. 31, 2020) 456 Declaration of Philip B. Stark (Sept. 13, 2020) 457 2021.07.16 - Expert Declaration of Dr. Benjamin Adida (Aug. 28, 2020) 458 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 459 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 459 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 450 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 450 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 451 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 452 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 453 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 454 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 455 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) 456 Declaration of Dr. Benjamin Adida (Sept. 17, 2020)		(Aug. 23, 2020)	Relevance (FRE 401), Improper
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Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401) 459 Declaration of Dr. Benjamin Adida (Sept. 17, 2020) Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)		Adida (Aug. 28, 2020)	, , , , , , , , , , , , , , , , , , , ,
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Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)	409	-	1
Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)		Adida (Sept. 17, 2020)	
Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)			
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Value (FRE 401)			
460 Attachments to Declaration of Thearsay (FRE 802/803)	460	Attachments to Declaration of	Hearsay (FRE 802/803),
Dr. Benjamin Adida (Sept. 17, Relevance (FRE 401)	100		
2020)		_	101)
461 2021.07.30 - Expert Rebuttal	461	 	
Report of Andrew W. Appel		_	

PX No.	Document Description	Defs.' Objection(s)
462	2021.08.02 - Expert Rebuttal	
	Declaration of J. Alex	
400	Halderman	H(EDE 009/009)
463	Declaration of Philip B. Stark (Aug. 2, 2021)	Hearsay (FRE 802/803), Relevance (FRE 401), Improper
	(Aug. 2, 2021)	Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative
		Value (FRE 401)
464	Appendix to Declaration of	Lack of Foundation (FRE 901),
	Philip B. Stark (Aug. 2, 2021)	Hearsay (FRE 802/803),
		Relevance (FRE 401)
465	Declaration of Philip B. Stark	Hearsay (FRE 802/803),
	(Jan. 10, 2022)	Relevance (FRE 401), Improper
		Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative
466	Appendices to Declaration of	Value (FRE 401)
400	Appendices to Declaration of Philip B. Stark (Jan. 10, 2022)	Lack of Foundation (FRE 901), Hearsay (FRE 802/803),
	1 IIIIp D. Stark (8aii. 10, 2022)	Relevance (FRE 401)
467	2022.11.10 Persinger	Hearsay (FRE 802/803),
407	Declaration	Relevance (FRE 401)
468	Exhibits to 2022.11.10	Hearsay (FRE 802/803),
100	Persinger Declaration	Relevance (FRE 401)
469	2022.11.22 Halderman	Hearsay (FRE 802/803),
	Declaration re Coffee County	Relevance (FRE 401), Improper
	· ·	Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative
450	22221122111	Value (FRE 401)
470	2022.11.22 Halderman	Lack of Foundation (FRE 901),
	Exhibit_A	Hearsay (FRE 802/803),
	_SSA1722_Hard_Drive_Conten	Relevance (FRE 401)
	ts	

PX No.	Document Description	Defs.' Objection(s)
471	2022.12.05 CGG Skoglund	Hearsay (FRE 802/803),
	Declaration Confidential	Relevance (FRE 401), Improper
		Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative Value (FRE 401)
472	2022.12.13 Second Persinger	Hearsay (FRE 802/803),
	Declaration	Relevance (FRE 401), Improper
		Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative
		Value (FRE 401)
473	Exhibits to 2022.12.13 Second	Lack of Foundation (FRE 901),
	Persinger Declaration	Hearsay (FRE 802/803),
		Relevance (FRE 401)
474	2023.01.07 Halderman Suppl.	Hearsay (FRE 802/803),
	Declaration re Coffee County	Relevance (FRE 401), Improper
		Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative
475	2022 01 07 H-11	Value (FRE 401)
475	2023.01.07 Halderman	Lack of Foundation (FRE 901),
	Exhibit_A_Regarding Password Reset and Changed Files	Hearsay (FRE 802/803), Relevance (FRE 401), Prejudice
	Reset and Changed Piles	Outweighs Probative Value
		(FRE 401)
476	2023.01.07 CGG Skoglund	Hearsay (FRE 802/803),
110	Declaration	Relevance (FRE 401), Improper
		Opinion Testimony By Lay
		Witness (FRE 701), Need For
		Personal Knowledge (FRE 602),
		Prejudice Outweighs Probative
		Value (FRE 401)
477	Exhibits to 2023.01.07 CGG	Lack of Foundation (FRE 901),
	Skoglund Declaration	Hearsay (FRE 802/803),
		Relevance (FRE 401)

PX No.	Document Description	Defs.' Objection(s)
478	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00192602	Relevance (FRE 401),
		Incomplete (FRE 106)
479	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00101411	Relevance (FRE 401),
		Incomplete (FRE 106)
480	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00128596	Relevance (FRE 401),
		Incomplete (FRE 106)
481	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00178628	Relevance (FRE 401),
		Incomplete (FRE 106)
482	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00101673	Relevance (FRE 401),
		Incomplete (FRE 106)
483	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00108403	Relevance (FRE 401),
		Incomplete (FRE 106)
484	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00122664	Relevance (FRE 401),
		Incomplete (FRE 106)
485	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00101265	Relevance (FRE 401),
		Incomplete (FRE 106)
486	STATE-DEFENDANTS-	Lack of Foundation (FRE 901),
	00202234 (RED EMBARGOED	Relevance (FRE 401),
	CISA)	Incomplete (FRE 106)
487	Dominion ImageCast X (ICX)	Lack of Foundation (FRE 901),
	Prime 21" BMD & associated	Hearsay (FRE 802/803),
	peripherals	Relevance (FRE 401),
		Incomplete (FRE 106)
488	Intentionally Left Blank	

PX No.	Document Description	Defs.' Objection(s)
489	FBI Server Image	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401),
490	Audio Recording of Scott Hall Phonecall	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
491	Feb. 10, 2022 AJC Audio Recording of Mark Niesse & Brad Raffensperger Discussing Alex Halderman's Report and Its Infeasibility in Real-World Conditions	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
492	Audio Recording of Gabe Sterling Describing Alex Halderman's Report as Untrustworthy	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
493	Coffee County Surveillance Videos	Lack of Foundation (FRE 901), Relevance (FRE 401), Incomplete (FRE 106)
494	The Carter Center, Restoring Confidence in American Elections Panel 3 (April 29, 2022), YouTube (May 9, 2022), https://www.youtube.com/watch?app=desktop&v=PbB_c_PX8 D8+at+approximately+35%3A3 0&feature=youtu.be	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
495	Misty Hampton - DouglasNow video Pt. 1	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
496	Misty Hampton - DouglasNow video Pt. 2	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)

PX No.	Document Description	Defs.' Objection(s)
497	Video of Cathy Latham - GA Senate Hearing	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
498	Intentionally Left Blank	
499	jeff-lenberg-reveals-details-of- forensic-investigation-in-coffee- county-ga-after-wapo-hit- piece.mp4	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
500	AP Image ID No. 21005555186625	Lack of Foundation (FRE 901), Relevance (FRE 401), Incomplete (FRE 106)
501	Image of Georgia Voting Machine, January 5, 2021	Lack of Foundation (FRE 901), Relevance (FRE 401), Incomplete (FRE 106)
502	June 7, 2021 BMD Photo	Lack of Foundation (FRE 901), Relevance (FRE 401)
503	Gabe Sterling, How to safeguard democracy, Universite de Geneve (Nov. 25, 2021)	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
504	Pages 291-315 from Curling - CCBOE Docs Responsive to Subpoenas (1)-Jill Resignation	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
505	Pages 221-245 from Curling - CCBOE Docs Responsive to Subpoenas (1)-Misty Resignation	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
506	Pages 5-45 of CCBOE Responses No. 2 - DyAnna Hayes Resignation	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)
507	11/10/2020 email thread between Robert Sinners and Misty Hampton, Sinners Requests Official Meeting	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401), Incomplete (FRE 106)

PX No.	Document Description	Defs.' Objection(s)
	Minutes and Audio of the	
	11/10/2020 BOE Meeting	
508	Coffee-Cnty-ORR00000231	Lack of Foundation (FRE 901),
		Hearsay (FRE 802/803),
		Relevance (FRE 401),
		Incomplete (FRE 106)
509	Dominion022179	Hearsay (FRE 802/803),
		Relevance (FRE 401),
		Incomplete (FRE 106)
510	Dominion023452	Hearsay (FRE 802/803),
		Relevance (FRE 401),
		Incomplete (FRE 106)
511	Dominion069797-072989	Hearsay (FRE 802/803),
	(October 2020)_Part225	Relevance (FRE 401),
		Incomplete (FRE 106)
512	Dominion075160-075991	Hearsay (FRE 802/803),
	(December 2020)_Part095	Relevance (FRE 401),
		Incomplete (FRE 106)
513	Dominion075160-075991	Hearsay (FRE 802/803),
		Relevance (FRE 401),
		Incomplete (FRE 106)
514	Dominion075992-076795	Hearsay (FRE 802/803),
	(January 2020)-emails	Relevance (FRE 401),
	only_Part098	Incomplete (FRE 106)
515	Dominion079353-081275	Hearsay (FRE 802/803),
		Relevance (FRE 401),
		Incomplete (FRE 106)
516	Dominion081276-081975 (June	Hearsay (FRE 802/803),
	2021)_Part026	Relevance (FRE 401),
		Incomplete (FRE 106)
517	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00001942	Relevance (FRE 401),
		Incomplete (FRE 106)
518	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00099430	Relevance (FRE 401),
		Incomplete (FRE 106)

PX No.	Document Description	Defs.' Objection(s)
519	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00100970	Relevance (FRE 401),
		Incomplete (FRE 106)
520	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00194205	Relevance (FRE 401),
		Incomplete (FRE 106)
521	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00101321	Relevance (FRE 401),
		Incomplete (FRE 106)
522	STATE-DEFENDANTS-	Hearsay (FRE 802/803),
	00095935	Relevance (FRE 401),
		Incomplete (FRE 106)
523	"Lawsuit: New Georgia voting	Lack of Foundation (FRE 901),
	system denies secret ballot,"	Hearsay (FRE 802/803),
	Feb. 25, 2020,	Relevance (FRE 401)
	https://www.youtube.com/watc	
	h?v=7JWiursXHEo	
524	"The Office of Secretary of	Lack of Foundation (FRE 901),
	State State of Georgia, In the	Hearsay (FRE 802/803),
	Matter of: State Election Board	Relevance (FRE 401)
	Meeting, Wednesday, June 21,	
	2023, Georgia State Capitol,	
	Room b341, Atlanta, Georgia,	
	9:00am, Volume 2 of 2," June	
	21, 2023,	
	https://sos.ga.gov/sites/default/f	
	iles/forms/2023%20Transcripts	
	_0.pdf	
525	"In The Matter Of: Athens-	Lack of Foundation (FRE 901),
	Clarke County Board Elections	Hearsay (FRE 802/803),
	and Registration, March 11,	Relevance (FRE 401)
	2020," Mar. 11, 2020,	
	https://sos.ga.gov/sites/default/f	
F00	iles/2022-02/2020_seb.pdf	I 1 CE 1/2 /PDE 001)
526	"In The Matter Of: Secretary of	Lack of Foundation (FRE 901),
	State Board Meeting, February	Hearsay (FRE 802/803),
	28, 2020," Feb. 28, 2020,	Relevance (FRE 401)
	https://sos.ga.gov/sites/default/f	
	iles/2022-02/2020_seb.pdf	

PX No.	Document Description	Defs.' Objection(s)
527	"In the Matter Of: State	Lack of Foundation (FRE 901),
	Election Board Meeting,	Hearsay (FRE 802/803),
	August 1, 2023," Aug. 1, 2023,	Relevance (FRE 401)
	https://sos.ga.gov/sites/default/f	
	iles/forms/SEB%208-01-	
	23_BUNDLE.pdf	
528	"In the Matter Of: State	Lack of Foundation (FRE 901),
	Election Board Meeting,	Hearsay (FRE 802/803),
	September 28, 2022," Sept. 22,	Relevance (FRE 401)
	2023,	
	https://sos.ga.gov/sites/default/f	
	iles/forms/2022%20Transcripts.	
	pdf	
529	"11/1/2023 - Senate Committee	Lack of Foundation (FRE 901),
	on Ethics," Nov. 1, 2023,	Hearsay (FRE 802/803),
	https://vimeo.com/showcase/907	Relevance (FRE 401),
	6408?video=868832917	Incomplete (FRE 106)
530	"Secretary Raffensperger	Lack of Foundation (FRE 901),
	Continues Focus on Election	Hearsay (FRE 802/803),
	Security for 2024," Sept. 6,	Relevance (FRE 401),
	2023,	Incomplete (FRE 106)
	https://madmimi.com/p/f406371	
	?pact=162731-175641393-	
	14307111335-	
	60a0fd97a05360e4386c82a31ac	
2 01	f06a19d9cd9b4	
531	Notice of Change in post-	
* 00	election audit law	I I AD I W (DDD 001)
532	Robert Sinners	Lack of Foundation (FRE 901),
	communications re: Coffee	Hearsay (FRE 802/803),
	investigation	Relevance (FRE 401),
F 00	E L'L' 1 D D L	Incomplete (FRE 106)
533	Exhibit 1, Brown Declaration,	Lack of Foundation (FRE 901),
	Jan. 10, 2023	Hearsay (FRE 802/803),
		Relevance (FRE 401)
534	Exhibit 2, Brown Declaration,	
	Dec. 4, 2022	
535	Exhibit 1, Davis Declaration,	
	Dec. 6, 2022	

PX No.	Document Description	Defs.' Objection(s)
536	Exhibit A, DuFort Declaration,	Lack of Foundation (FRE 901),
	Jan. 1, 2022	Incomplete (FRE 106), Best
		Evidence Rule (FRE 1001-1008)
537	Exhibit B, DuFort Declaration,	Lack of Foundation (FRE 901),
	Nov. 1, 2022	Incomplete (FRE 106), Best
	,	Evidence Rule (FRE 1001-
		1008)
538	Exhibit C, DuFort Declaration,	Lack of Foundation (FRE 901),
	May 24, 2022	Incomplete (FRE 106), Best
		Evidence Rule (FRE 1001-
E 20	Enhibit D. Du Fant Declaration	1008)
539	Exhibit D, DuFort Declaration, May 24, 2022	Lack of Foundation (FRE 901), Incomplete (FRE 106), Best
	Way 24, 2022	Evidence Rule (FRE 1001-
		1008)
540	Exhibit E, DuFort Declaration,	Lack of Foundation (FRE 901),
	Nov. 3, 2020	Incomplete (FRE 106), Best
		Evidence Rule (FRE 1001-
		1008)
541	Exhibit F, DuFort Declaration,	Lack of Foundation (FRE 901),
	Nov. 3, 2020	Incomplete (FRE 106), Best
		Evidence Rule (FRE 1001-1008)
542	Exhibit G, DuFort Declaration,	Hearsay (FRE 802/803),
	Dec. 5, 2022	Relevance (FRE 401)
543	Exhibit 17, Hursti Declaration,	Lack of Foundation (FRE 901),
	Sept. 1, 2020	Best Evidence Rule (FRE 1001-
F 4 4	E 1:1:4.10 A M1.	1008)
544	Exhibit 19-A, Marks Declaration, Sept. 1, 2020	Lack of Foundation (FRE 901), Best Evidence Rule (FRE 1001-
	Deciaration, Sept. 1, 2020	1008)
545	Exhibit 19-B, Marks	Hearsay (FRE 802/803)
	Declaration, Aug. 28, 2020	·
546	Exhibit 19-C, Marks	Hearsay (FRE 802/803)
	Declaration, Sept. 1, 2020	TI CONTRACTOR OF THE CONTRACTO
547	Exhibit 19-D, Marks	Hearsay (FRE 802/803)
	Declaration, Sept. 1, 2020	

PX No.	Document Description	Defs.' Objection(s)
548	Exhibit 1, Marks Declaration, Feb. 12, 2021	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 401)
549	Exhibit 2, Marks Declaration, Feb. 12, 2021	
550	Exhibit 3, Marks Declaration, Feb. 12, 2023	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1001- 1008)
551	Exhibit E, DuFort Declaration, Nov. 3, 2020	Lack of Foundation (FRE 901), Best Evidence Rule (FRE 1001- 1008)
552	Exhibit F, DuFort Declaration, Nov. 3, 2020	Lack of Foundation (FRE 901), Best Evidence Rule (FRE 1001- 1008)
553	Exhibit G, DuFort Declaration, Dec. 5, 2022	Lack of Foundation (FRE 901), Hearsay (FRE 802/803)
554	Exhibit 1, Martin Declaration, Jan. 1, 2020	
555	Exhibit 2, Martin Declaration, Aug. 11, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1001- 1008)
556	Exhibit 1, Marks Declaration, Aug. 24, 2020	Hearsay (FRE 802/803), Relevance (FRE 401)
557	Exhibit 2, Marks Declaration, May 21, 2020	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1001- 1008), Impermissible Expert Testimony (FRE 703/701), Best Evidence Rule (FRE 10001- 1008)
558	Exhibit 3, Marks Declaration, Aug. 11, 2020	Lack of Foundation (FRE 901), Best Evidence Rule (FRE 1001- 1008)

PX No.	Document Description	Defs.' Objection(s)
559	Exhibit 4, Marks Declaration,	Hearsay (FRE 802/803),
	Aug. 19, 2020	Relevance (FRE 403)
560	Exhibit A, DuFort Declaration,	Lack of Foundation (FRE 901),
	Aug. 23, 2020	Hearsay (FRE 802/803),
		Relevance (FRE 401)
561	Exhibit B, DuFort Declaration,	Lack of Foundation (FRE 901),
	June 13, 2020	Hearsay (FRE 802/803),
		Relevance (FRE 401)
562	Exhibit C, DuFort Declaration,	Lack of Foundation (FRE 901),
	Aug. 23, 2020	Hearsay (FRE 802/803),
		Relevance (FRE 401)
563	Exhibit D, DuFort Declaration,	Lack of Foundation (FRE 901),
	Aug. 10, 2020	Hearsay (FRE 802/803), Best
		Evidence Rule (FRE 1001- 1008)
564	Exhibit 1, Shirley Declaration,	Lack of Foundation (FRE 901),
004	Aug. 11, 2020	Hearsay (FRE 802/803),
	1149. 11, 2020	Incomplete (FRE 106), Best
		Evidence Rule (FRE 1001-
		1008)
565	Exhibit 2, Shirley Declaration,	Lack of Foundation (FRE 901),
	Aug. 11, 2020	Hearsay (FRE 802/803),
		Incomplete (FRE 106), Best
		Evidence Rule (FRE 1001-
F 00	E 1:1:4 9 Cl : 1 D 1 4:	1008)
566	Exhibit 3, Shirley Declaration,	Lack of Foundation (FRE 901),
	Aug. 11, 2020	Hearsay (FRE 802/803), Incomplete (FRE 106), Best
		Evidence Rule (FRE 1001-
		1008)
567		/
(old 46)	2019-08-09 State Defs Suppl	
	Notice re New Election System	
	Vendor Contract	
568		
(old 46)		
	2019-08-09 Ex. A - August 9,	
	2019 Notice of Award	

PX No.	Document Description	Defs.' Objection(s)
569 (old 46)	2019-08-09 Ex. B - August 9, 2019 Certification of the Dominion Voting System for Georgia	
570 (old 131)	State Defs' Supplement to Response to this Court's July 23, 2019 Order	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
571 (old 131)	SOS Notice of Intent to Award	Defendants object to this exhibit on the basis of relevance, F.R.E. 401; Defendants further object to the exhibit on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403
572 (old 488)	Halderman demonstration video involving Fulton County election equipment	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
573 (old 488)	Stillshots of Halderman demonstration video involving Fulton County election equipment	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Lay Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)

PX No.	Document Description	Defs.' Objection(s)
574	Short video embedded in	Lack of Foundation (FRE 901),
(old	11Alive Staff, Questions raised	Hearsay (FRE 802/803),
498)	in timeline of state response to	Relevance (FRE 401),
	Coffee County breach, 11Alive	Incomplete (FRE 106)
	News (Sep. 26, 2022, 1:44 PM)	
575	Long video embedded in	Lack of Foundation (FRE 901),
(old	11Alive Staff, Questions raised	Hearsay (FRE 802/803),
498)	in timeline of state response to	Relevance (FRE 401),
	Coffee County breach, 11Alive	Incomplete (FRE 106)
	News (Sep. 26, 2022, 1:44 PM)	

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, et al.

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

ATTACHMENT D-2: CGG PLAINTIFFS' EXHIBIT LIST Revised December 11, 2023

CGG Plaintiffs identify herein the individual pieces of documentary and physical evidence that will be tendered at trial. State Defendants' objections to CGG Plaintiffs' exhibits are listed separately following CGG Plaintiffs' exhibit list. CGG Plaintiffs reserve the right to modify or supplement this list of exhibits based on further discovery of information and the pretrial proceedings in this lawsuit. CGG Plaintiffs further reserve the right to supplement this list with reasonable notice to counsel.

Defendants reserve the right to object to CGG Plaintiffs' additional exhibits added on December 11, 2023 after review.

PX No.	Document Description	Citation
CGG 02	CGG Complaint to SEB regarding SOS failure to comply with post-election audit statutes	See exhibit folder CGG 02
CGG 04	CGG rule-making request for LAT compliance	See exhibit folder CGG 04
CGG 05	CGG rule-making request for CISA security evaluation	See exhibit folder CGG 05
CGG 06	CGG rule-making request for security incident reporting	See exhibit folder CGG 06
CGG 10	CGG Complaint to SEB regarding Misty Hampton access to Treutlen County Voting system	See exhibit folder CGG 10
CGG 11	Informal transcript Senate Ethics Comm Hearing re: Election Security	See exhibit folder CGG 11
CGG 12	Court Hearing Transcript re: Sidney Powell's request to image voting system Pearson v Kemp	See exhibit folder CGG 12
CGG 19	Documentation by CGG observers of security conditions and requirements (obtained via Open Records Requests) for municipalities borrowing county voting system equipment11/7/23 election	
CGG 26	Emails among Chairman Duffey, staff and GBI re: Sept. 28, 2022 SEB meeting re: Halderman Report, Coffee County	See exhibit folder CGG 26

PX No.	Document Description	Citation
CGG 27	WJBF report on SOS check of voting system m including embedded video https://www.wjbf.com/csranews/georgia-secretary-of-state-visits-glascock-county-to-check-voting-equipment/?utm_source=ground.news&utm_medium=referral	WJBF report on SOS check of voting system m including embedded video https://www.wjbf.com/csranews/georgia-secretary-of-state-visits-glascock-county-to-check-voting-equipment/?utm_source=ground.new s&utm_medium=referral
CGG 28	WALB report on "Health Checks" with embedded video Raffensperge interview re: election security. https://www.walb.com/2023/09/13/ga-secretary-state-brad-raffensperger-discusses-health-checks-voting-machines-statewide/	WALB report on "Health Checks" with embedded video Raffensperge interview re: election security. https://www.walb.com/2023/09/13/g a-secretary-state-brad-raffensperger-discusses-health-checks-voting-machines-statewide/
CGG 29	Washington Examiner Article re: "health checks" and 2024 election security with SOS quotes. https://www.washingtonexamine r.com/politics/georgia-voting-machines-security-under-scrutiny-2024	Washington Examiner Article re: "health checks" and 2024 election security with SOS quotes. https://www.washingtonexaminer.co m/politics/georgia-voting-machines- security-under-scrutiny-2024
CGG 31	Northampton PA BMDs misrecording votes https://bradblog.com/?p=14839	Northampton PA BMDs misrecording votes https://bradblog.com/?p=14839

PX No.	Document Description	Citation
CGG 32	SEB Meeting transcript	See exhibit folder CGG 32
CGG 33	SEB Letter rejecting CGG rule-making petition	See exhibit folder CGG 33
CGG 34	CGG letter to SEB re: AG's opinion on conditions for use of voting systems	See exhibit folder CGG 34
CGG 35	SEB Letter rejection CGG rule- making petitions	See exhibit folder CGG 35
CGG 36	Nov. 29, 2023 CGG Rule- making petition to SEBLAT	See exhibit folder CGG 36, 36-A
CGG 37	Nov. 29, 2023 CGG Rule- making petition to SEB—Ballot secrecy	See exhibit folder CGG 37
CGG 38	July 14-22, 2022 emails Rachel Roberts to SOS re: recertification of Coffee equipment (source GBI image)	See exhibit folder CGG 38
CGG 39	July 15, 2022 email Germany to Herzog, re: recertification of Coffee equipment	See exhibit folder CGG 39
CGG 40	Skoglund paperProblems in Northampton, PA in Nov. 2023	See exhibit folder CGG 40
CGG 41	Coffee County James Barnes email request to Cox re: Draft Report to Josh Blanchard 8/24/21 (source GBI image)	See exhibit folder CGG 41
CGG 42	Cox email re: Barnes's draft report to Josh Blanchard 8/24/21 (source: GBI image)	See exhibit folder CGG 42

PX No.	Document Description	Citation
CGG 43	Gabe Sterling 11/7/23 Tweet Re: Northampton election	See exhibit folder CGG 43
CGG 44	April 11, 2022 Text Messages Exchange Germany/ Herzog re: Coffee County and Wash Post article pending	See exhibit folder CGG 44
CGG 45	James Barnes Report to Blanchard 8/24/21 Equipment Condition	See exhibit folder CGG 45
CGG 46	April 12, 2022 Herzog/Germany emails re Washington Post inquiry re: Coffee County	See exhibit folder CGG 46
CGG 47	April 11, 2022 emails Washington Post and SOS re: Coffee	See exhibit folder CGG 47
CGG 48	12/18/20 SOS discussion of Fulton absentee voting issues	See exhibit folder CGG 48
CGG 49	4/25/22 SOS/Brumback emails re: opening of Coffee investigation	Doc. 1633-7
CGG 50	SOS Spokesman to Wash Post Re: imaging of Coffee server 5/12/22	See exhibit folder CGG 50
CGG 51	Washington Post inquiry re: no chain of custody form for Coffee server 4/28/22	See exhibit folder CGG 51
CGG 52	SOS to Coffee re: conducting interviews 7/20/22-7/21/22	See exhibit folder CGG 52
CGG 53	Barnes to SOS re Credentials for Coffee Server 5/24/21	See exhibit folder CGG 53

PX No.	Document Description	Citation
~~~	Washington Post /SOS emails re:	
CGG	Coffee County and BMDs	See exhibit folder CGG 54
54	10/21/22	
CGG 55	SOS approves reuse of memory cards in Coffee 6/1/22	See exhibit folder CGG 55
CGG 56	Emma Brown to Vickers 3/28/22 re Coffee Server breach	See exhibit folder CGG 56
CGG 57	12/31/20 Haliburton to Hampton re: inspection in Coffee (source: GBI image)	See exhibit folder CGG 57
CGG 58	12/3/20-12/5/20 Text Messages Tony Rowell to Voyles re Ware County Machine	See exhibit folder CGG 58

PX No.	<b>Document Description</b>	State Defendants' Objections
CGG 02	CGG Complaint to SEB regarding SOS failure to comply with post-election audit statutes	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Incomplete (FRE 106), Best Evidence Rule (FRE 1006)
CGG 04	CGG rule-making request for LAT compliance	
CGG 05	CGG rule-making reequest for CISA security evaluation	
CGG 06	CGG rule-making request for security incident reporting	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Best Evidence Rule (FRE 1006)
CGG 10	CGG Complaint to SEB regarding Misty Hampton access to Treutlen County Voting system	Hearsay (FRE 802/803), Relevance (FRE 401), Improper Opinion Testimony By Law Witness (FRE 701), Need For Personal Knowledge (FRE 602), Prejudice Outweighs Probative Value (FRE 401)
CGG 11	Informal transcript Senate Ethics Comm Hearing re: Election Security	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Best Evidence Rule (FRE 1006)
CGG 12	Court Hearing Transcript re: Sidney Powell's rquest to image voting system Pearson v Kemp	
CGG 19	Documentation by CGG observers of security conditions and requirements (obtained via Open Records Requests) for municipaltities borrowing county voting system equipment-11/7/23 election	
CGG 26	Emails among Chairman Duffey, staff and GBI re: Sept. 28, 2022 SEB meeting re: Halderman Report, Coffee County	Lack of Foundation (FRE 901), Hearsay (FRE 802/803), Relevance (FRE 403), Incomplete (FRE 106)

PX No.	<b>Document Description</b>	State Defendants' Objections
CGG 27	WJBF report on SOS check of	Lack of Foundation (FRE 901),
	voting system m including	Hearsay (FRE 802/803),
	embedded video	Relevance (FRE 401), Incomplete
	https://www.wjbf.com/csra-	(FRE 106)
	news/georgia-secretary-of-state-	
	visits-glascock-county-to-check-	
	voting-	
	equipment/?utm_source=ground.	
666.20	news&utm_medium=referral	I I CE I I (EDE 001)
CGG 28	WALB report on "Health	Lack of Foundation (FRE 901),
	Checks" with embedded video	Hearsay (FRE 802/803),
	Raffensperge interview re:	Relevance (FRE 401), Incomplete
	election security.	(FRE 106)
	https://www.walb.com/2023/09/	
	13/ga-secretary-state-brad-	
	raffensperger-discusses-health-	
	checks-voting-machines-	
	statewide/	
CGG 29	Washington Examiner Article re:	Lack of Foundation (FRE 901),
	"health checks" and 2024	Hearsay (FRE 802/803),
	election security with SOS	Relevance (FRE 401), Incomplete
	quotes.	(FRE 106)
	https://www.washingtonexamine	
	r.com/politics/georgia-voting-	
	machines-security-under-	
~~~	scrutiny-2024	
CGG 31	Northampton PA BMDs	Lack of Foundation (FRE 901),
	misrecording votes	Hearsay (FRE 802/803),
	https://bradblog.com/?p=14839	Relevance (FRE 401), Incomplete
CCC 22	SED Mosting transport	(FRE 106)
CGG 32	SEB Meeting transcript	Hearsay (FRE 802/803),
CGG 33	SEB Letter rejecting CGG rule-	Relevance (FRE 401) Lack of Foundation (FRE 901),
	making petition	Hearsay (FRE 802/803),
	making poution	Relevance (FRE 401), Incomplete
		(FRE 106)
		(1111 100)

PX No.	Document Description	State Defendants' Objections
CGG 34	CGG letter to SEB re: AG's	Hearsay (FRE 802/803), Best
	opinion on conditions for use of	Evidence Rule (FRE 1006),
	voting systems	Improper Opinion Testimony By
		Lay Witness (FRE 701)
CGG 35	SEB Letter rejection CGG rule-	
	making petitions	

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, et al.

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

ATTACHMENT D-3: DEFENDANTS' EXHIBIT LIST

Defendants identify herein their trial exhibits for this lawsuit. Plaintiffs' objections to Defendants' trial exhibits are listed separately following Defendants' exhibit list. Defendants reserve the right to modify or supplement this list of proposed trial exhibits based on further discovery of information and the pretrial proceedings in this lawsuit. Defendants further reserve the right to supplement this list with reasonable notice to counsel.

The document type and document description of the proposed trial exhibits below are to help Plaintiffs identify the exhibits. If any document type or document description is incorrect, Defendants reserve the right to clarify. If there is any confusion about the identity of a document, please contact counsel for Defendants.

Exhibit	Document Description	Document Type
1	2018.08.14 Declaration of Merritt Beaver (Exhibit 1 to Defs' Kemp and State Election Board Response to Motions for Preliminary Injunction)	Declaration
2	2018.08.14 Declaration of Chris Harvey (Exhibit 2 to Defs' Kemp and State Election Board Response to Motions for Preliminary Injunction	Declaration
3	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Declaration of Michael Shamos, Ph.D., J.D.	Declaration
4	Exhibit A to Declaration of Michael Shamos, Ph.D 472-1: Resume of Michael Ian Shanos	Resume
5	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit B - Declaration of S. Merritt Beaver	Declaration

Exhibit	Document Description	Document Type
No.		
6	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit C - Declaration of Theresa Payton	Declaration
7	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit D - Declaration of Michael Barnes	Declaration
8	Exhibit A to Declaration of Michael Barnes - Certified copy of the Direct Record Electronic Voting Machine Recap for Fulton County precincts 06G, 02J, and 02K at the Grady High School Polling Location from the 2018 General Election Held on November 6, 2018.	Certified Record
9	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit E - Rockdale Co. Response to Subpoena	Pleading - Response

Fyhihii	Document Description	Document Type
No.	Document Description	Document Type
10	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit F - Declaration of Chatham Co Elections Supervisor, Russell Bridges	Declaration
11	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit G - Michael Barnes Deposition Excerpts	Deposition Excerpts - Michael Barnes Deposition
12	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit H - Jennifer Doran Deposition Excerpts	Deposition Excerpts - Jennifer Doran Deposition
13	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit I - T. Lynn Ledford Deposition Excerpts	Deposition Excerpts - Lynn Ledford Deposition
14	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit J - Michael Barnes Deposition Transcript	Deposition Transcript

Exhibit No.	Document Description	Document Type
15	2020.08.24 Exhibit 1 to Defs' Emergency Mot for Expedited Discovery for Preliminary Iinjunction Hearing - State Defs' Second RPDs to Curling Plaintiffs dated 08.21.2020	Discovery
16	2020.08.24 Exhibit 2 to Defs' Emergency Mot for Expedited Discovery for Preliminary Iinjunction Hearing - Email thread from Cross to Belifnante et al re Curling - RPDs to Curling Plaintiffs and expedited discovery concerns dated 08.21.2020	Email
17	2020.08.25 Exhibit 1 to Response re Motion forPreliminary Injunction on paper Pollbook Backups - Affidavit Declaration of Chris Harvey	Declaration
18	2020.08.26 Exhibit 1 (A) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit A - Dec. of Dr. Eric D. Coomer	Declaration

Fwhihi	Decument Description	Decument Type
No.	Document Description	Document Type
19	2020.08.26 Exhibit 2 (B) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit B - Dec. of Juan E. Gilbert, Ph.D	Declaration
20	2020.08.26 Exhibit 3 (C) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit C - Part 1 - Deposition of J. Alex Halderman, Ph.D	Deposition
21	2020.08.26 Exhibit 4 (C-2) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit 2 - Part 2 of 3 - Deposition of J. Alex Halderman, Ph.D and (Exs. 1-9)	Compilation of Halderman Deposition Exhibits 1 - 9
22	Halderman Deposition Exhibit 1 - Expert Report of J.Alex Halderman	Deposition Exhibit

Exhibit No.	Document Description	Document Type
23	Halderman Deposition Exhibit 2 - Expert Report of J.Alex Halderman	Deposition Exhibit
24	Halderman Deposition Exhibit 2 (A) of Expert Report of J.Alex Halderman - Halderman CV	Deposition Exhibit
25	Halderman Deposition Exhibit 3 - Supplement to the Expert Report of H. Alex Halderman	Deposition Exhibit
26	Halderman Deposition Exhibit 4 - Website page - Election Verification Network Agenda for 2019 Conference dated 02.18.2020	Deposition Exhibit
27	Halderman Deposition Exhibit 5 - Website page - Election Verification Network About Us page	Deposition Exhibit
28	Halderman Deposition Exhibit 6 - U.S. House Appropriations Subcommittee on Financial Service and General Government "Election Security: Ensuring the Integrity of U.S. Election Systems" February 17, 2019	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	•	<i>V</i> 1
29	Halderman Deposition Exhibit 7- U.S. Senate Select Committee on Intelligence Russian Interference in the 2016 U.S. Elections - Expert Testimony by J. Alex Halderman Professor of Computer Science, University of Michigan dated 06.21.2017	Deposition Exhibit
30	Halderman Deposition Exhibit 8 - Redacted Report of the Select Committee on Intelligence United States Senate on Russian Active Measures Campaigns and Interference in the 2016 U.S. Election Volume 1: Russian Efforts Against Election Infrastructure with Additional Views.	Deposition Exhibit
31	Halderman Deposition Exhibit 9 - New York Times article, "I Hacked an Election by J. Alex Halderman. So Can the Russians" dated April 5, 2018	Deposition Exhibit
32	2020.08.26 Exhibit 5 (C-3) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit 3 - Part 3 of 3 -	Compilation of Halderman Deposition Exhibits 10 through 15

Exhibit No.	Document Description	Document Type
	Deposition of J. Alex Halderman, Ph.D and (Exs. 10-15)	
33	Halderman Deposition Exhibit No. 10 - 2017.06.21 Article co-authored by Jay Halderman entitled "Here's how to keep Russian hackers from attacking the 2018 elections"	Deposition Exhibit
34	Halderman Deposition Exhibit No. 11 - Medium.com online article entitled Want to Know if the Election was Hacked? Look at the Ballots authored by J. Alex Halderman	Deposition Exhibit
35	Halderman Deposition Exhibit No. 12 alumnus.alumni.umrich.edu (University of Michigan) online article entitled Hacking the Vote: It's Easier Than You Thing by Steve Friess - Professor J. Alex Halderman has made a career studying electronic voting security	Deposition Exhibit

	Document Description	Document Type
No.	TI 11 D	D D 1 1 1
36	Halderman Deposition	Deposition Exhibit
	Exhibit No. 13 - U.S. Patent	
	No. 8,033,463B@ dated	
	10.11.2011 by Felten for	
	System and Method for	
	Machine-Assited Election	
	Auditing	
37	Verified Voting Foundation	Deposition Exhibit
	article entitled Principles for	
	New Voting Systems dated	
	02.01.2015	
38	Halderman Deposition	Deposition Exhibit
	Exhibit No. 15 - Undated	
	University of Michigan article	
	entitled "Can Voters Detect	
	Malicious Manipulation of	
	Ballot Marking Devices?" co-	
	authored by J. Alex	
00	Halderman	D 1 (
39	Exhibit 6 (D) to RESPONSE	Declaration
	in Opposition re 785 MOTION	
	for Preliminary Injunction	
	State Defendants' Response	
	in Opposition to Curling	
	Plaintiffs' Fourth Motion for	
	Preliminary Injunction -	
	Declaration of Jack Cobb	

D1-11-1	Decree and Degening	Do our out Tree
	Document Description	Document Type
No.		
40	Exhibit 7 (E) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Declaration of Jaun E. Gilbert, PH.D.	Declaration
41	Exhibit 8 (F) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Declaration of Mark Riccobono	Declaration
42	Exhibit 9 (G) to RESPONSE in Opposition re 785 MOTION for Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Supplemental Declaration of Chris Harvey	Declaration

Exhibit	Document Description	Document Type
No.		
44 44	Exhibit 1 (A) to RESPONSE in Opposition re 809 MOTION for Preliminary Injunction on BMDs, Scanning and Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - Supplemental Declaration of Dr. Eric Coomer Exhibit 2 (B) to RESPONSE in Opposition re 809 MOTION for Preliminary Injunction on BMDs, Scanning and Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - Declaration of Dr. Benjamin Adida	Declaration

Exhibit	Document Description	Document Type
No.	2 comment Description	2 common 1, po
45	Exhibit 3 (C) to RESPONSE in Opposition re 809 MOTION for Preliminary Injunction on BMDs, Scanning and Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - Supplemental Declaration of Chris Harvey	Declaration
46	Exhibit 1 (A) to SURREPLY BRIEF re 785 MOTION for Preliminary Injunction State Defendants' Surreply in Opposition to Curling Plaintiffs' Fourth Preliminary Injunction Motion - Supplemental Declaration of Jack Cobb	Declaration
47	Exhibit 2 (B) to SURREPLY BRIEF re 785 MOTION for Preliminary Injunction State Defendants' Surreply in Opposition to Curling Plaintiffs' Fourth Preliminary Injunction Motion - Supplemental Declaration of Chris Harvey	Declaration

Exhibit No.	Document Description	Document Type
48	State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction	Pleading
49	Exhibit 1 to State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction - Declaration of Derrick Gilstrap	Declaration
50	Exhibit 2 to State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction - Online article from Savannah now entitled "Recount results in: Derek Mallow wins Georgia House race by 19 votes authored by DeAnn Komanecky	Article
51	2019.07.25 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 1 of 2	Hearing Transcript
52	2019.07.26 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 2 of 2	Hearing Transcript
53	2020.09.10 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 1	Hearing Transcript

Exhibit No.	Document Description	Document Type
54	2020.09.11 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 2	Hearing Transcript
55	2020.09.14 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 3	Hearing Transcript
56	Appel, Andrew 2022.01.07 Deposition Exhibit 1 - Notice of Deposition of Andrew W. Appel	Deposition Exhibit
57	Appel, Andrew 2022.01.07 Deposition Exhibit 2 - Declaration of Andrew W.Appel in Support of Motion for Preliminary Injunction	Deposition Exhibit
58	Appel, Andrew 2022.01.07 Deposition Exhibit 3 - Expert Review of Andrew W. Appel,	Deposition Exhibit
59	Appel, Andrew 2022.01.07 Deposition Exhibit 4 - Declaration of Andrew W. Appel iso Mot for PI	Deposition Exhibit
60	Appel, Andrew 2022.01.07 Deposition Exhibit 5 - Declaration of Andrew W. Appel iso Mot for PI	Deposition Exhibit
61	Appel, Andrew 2022.01.07 Deposition Exhibit 6 - Declaration of Juan E. Gilbert, Ph.D	Deposition Exhibit
62	Appel, Andrew 2022.01.07 Deposition Exhibit 7 - State Defs' Expert Disclosures - Reports	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	Bocament Bescription	Bocament Type
63	Appel, Andrew 2022.01.07 Deposition Exhibit 8 - Rebuttal Report of Andrew W. Appel, 07/30/21	Deposition Exhibit
64	Appel, Andrew 2022.01.07 Deposition Exhibit 9 - Freedom to Tinker article entitle, Georgia's Election Certification Avoided an EvenWorse Nightmare That's Just Waiting to Happen Next Time	Deposition Exhibit
65	Appel, Andrew 2022.01.07 Deposition Exhibit 10 - Freedom to Tinker article entitled, Did Sean Hannity misquote me?	Deposition Exhibit
66	Appel, Andrew 2022.01.07 Deposition Exhibit 11 - Freedom to Tinker article entitled, Voting Machines I Recommend	Deposition Exhibit
67	Appel, Andrew 2022.01.07 Deposition Exhibit 12 - Document entitled Scientistssay no credible eidence ofcomputer fraud in the 2020 election outcome, but policy makers must work with experts to imporve confidence	Deposition Exhibit
68	Barnes, Michael 2019.06.27 Deposition Exhibit 20 - Defendants Secretary of State, State Election Board, and State Election Board Members' Response to Order Dated April 16, 2019	Deposition Exhibit

Exhibit No.	Document Description	Document Type
69	Barnes, Michael 2019.06.27 Deposition Exhibit 21 - E- mail with attachment to Milsteen from Marks, 10/11/17, Bates labeled CGG 1 - 190	Deposition Exhibit
70	Barnes, Michael 2019.06.27 Deposition Exhibit 22 - Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 12.4 Challenge Board	Deposition Exhibit
71	Barnes, Michael 2019.06.27 Deposition Exhibit 23 - Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 2.3 Deleting a Database	Deposition Exhibit
72	Barnes, Michael 2019.06.27 Deposition Exhibit 24 - Ballot image printout from GEMS computer	Deposition Exhibit
73	Barnes, Michael 2019.06.27 Deposition Exhibit 25 - Ballot image report from a GEMS computer	Deposition Exhibit
74	Barnes, Michael 2019.06.27 Deposition Exhibit 26 - Handwritten page	Deposition Exhibit
75	Barnes, Michael 2019.06.27 Deposition Exhibit 27 - Direct Record Electronic Voting Machine Recap records	Deposition Exhibit
76	Barnes, Michael 2019.06.27 Deposition Exhibit 28 - Copy of photograph	Deposition Exhibit
77	Barnes, Michael 2019.06.27 Deposition Exhibit 29 - USA vs. Netyksho, et al. Indictment	Deposition Exhibit

	Document Description	Document Type
No. 78	Barnes, Michael 2019.06.27	Deposition Exhibit
. 0	Deposition Exhibit 30 -	_ op octoron
	Russian Targeting of Election	
	Infrastructure During the	
	2016 Election: Summary of	
	Initial Findings and	
	Recommendations, May 8,	
	2018	
79	Barnes, Michael 2019.06.27	Deposition Exhibit
	Deposition Exhibit 31 - "Who,	
	What, Why" article titled	
	"Kemp's Aggressive Gambit to	
	Distract from Election	
	Security Crisis."	
80	Barnes, Michael 2019.06.27	Deposition Exhibit
	Deposition Exhibit 32 - Press	
	release from the Secretary of	
	State's office entitled, After	
	Failed Hacking Attempt SOS	
	Launches Investigation into	
0.1	Georgia Democratic Party	7.111
81	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 1 - Curling	
	Plaintiffs Third Amd NOD of	
	Office of the Secretary of the	
00	State, no Bates Numbers	D ':: E 1 1 ::
82	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 2 -	
	Michael Barnes LinkedIn	
00	Profile - No Bates Numbers	Descrition Fabilit
83	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 3 - Michael Barnes LinkedIn	
0.4	Profile - No Bates Numbers Remag Michael 2002 02 11	Donosition F-hihit
84	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 4 - Email	
	chain dated January 2020	

Exhibi	Document Description	Document Type
No.		
85	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 5 - Email	
	chain dated January 2020	
86	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 6 - Email	
	chain dated February 2020	
87	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 7 - Email	
	chain dated February 2020	
88	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 8 - Email	
	chain dated February 2020	
89	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 9 - Email	
	chain dated May 2020	
90	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 10 - Email	
	dated 06/01/2020 from Scott	
	Tucker to Gabriel Sterling	
	and others	
91	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 11 - Email	
	dated 06/01/2020 from Scott	
	Tucker to Gabriel Sterling	
	and others	
92	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 12 - Email	
	dated 06/01/2020	
93	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 13 Email	
	chain dated 06/03/20 20	
94	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 14 - Email	
	chain dated 06/20/2020	
95	Barnes, Michael 2022.02.11	Deposition Exhibit
	Deposition Exhibit 15 - Email	
	chain dated 06/20/2020	

Exhibit No.	Document Description	Document Type
96	Barnes, Michael 2022.02.11 Deposition Exhibit 16 - Email chain dated 06/20/2020	Deposition Exhibit
97	Barnes, Michael 2022.02.11 Deposition Exhibit 17 - Email chain dated 06/20/2020	Deposition Exhibit
98	Barnes, Michael 2022.02.11 Deposition Exhibit 18 - Email chain dated 06/20/2020	Deposition Exhibit
99	Barnes, Michael 2022.02.11 Deposition Exhibit 19 - Email dated 06/11/2020 fro Cynthia Willingham to Scott Tucker and Others	Deposition Exhibit
100	Barnes, Michael 2022.02.11 Deposition Exhibit 20 - Email chain dated 06/20/2020	Deposition Exhibit
101	Barnes, Michael 2022.02.11 Deposition Exhibit 21 - Email chain dated 06/20/2020	Deposition Exhibit
102	Barnes, Michael 2022.02.11 Deposition Exhibit 22- Email chain dated July 2020	Deposition Exhibit
103	Barnes, Michael 2022.02.11 Deposition Exhibit 23 - Email chain dated August 2020	Deposition Exhibit
104	Barnes, Michael 2022.02.11 Deposition Exhibit 24 - Email chain dated August 2020	Deposition Exhibit
105	Barnes, Michael 2022.02.11 Deposition Exhibit 25 - Email chain dated September 2020	Deposition Exhibit
106	Barnes, Michael 2022.02.11 Deposition Exhibit 26 - Email chain dated September 2020	Deposition Exhibit

Exhibit	Document Description	Document Type
107	Barron, Richard 2022.01.31 Deposition Exhibit 1 - 1-18- 22, Curling Plaintiffs' Third Amended Notice of Deposition of Fulton County Defendants re: The above-captioned action.	Deposition Exhibit
108	Barron, Richard 2022.01.31 Deposition Exhibit 9 - 466, 9-29-20, E-mail string from Scott Tucker to Blake Evans re:Two ballots printing	Deposition Exhibit
109	Barron, Richard 2022.01.31 Deposition Exhibit 10 - 06.09.2020 - E-mail string from Chris Harvey to Richard Barron 16 re: Fulton County - Machines Down and Polling Places Not Open.	Deposition Exhibit
110	Barron, Richard 2022.01.31 Deposition Exhibit 11 - Withdrawn by counsel	Deposition Exhibit

Fyhihid	Document Description	Dogument Type
No.	Document Description	Document Type
111	Barron, Richard 2022.01.31 Deposition Exhibit 13 - 8-11- 20, E-mail string from Blake Evans to Richard Barron, Dwight Brower, Sharon Benjamin and Johnny Harris re: Elections complaint from Thomas Elliott.	Deposition Exhibit
112	Barron, Richard 2022.01.31 Deposition Exhibit 19 - 9-10- 20, E-mail string from Richard Barron to Brigitte Bailey, Gabriel Sterling and Dwight Brower re: Fulton AdvanceVoting Issue.	Deposition Exhibit
113	Barron, Richard 2022.01.31 Deposition Exhibit 25 - PowerPoint re: Fulton Election Day Issues	Deposition Exhibit
114	Barron, Richard 2022.01.31 Deposition Exhibit 26 - 06.09.2020 E-mail string from Ryan German to Frances Watson and ChrisHarvey re: Polling Machine Issue	Deposition Exhibit

	Document Description	Document Type
No.		
115	Barron, Richard 2022.01.31 Deposition Exhibit 27 - 07.16.2020 E-mail string from Richard Barron to Julie Houk and Ryan Germany re: Urgent demands 10 to send corrected absentee ballots to Fulton Co. Voters	Deposition Exhibit
116	Barron, Richard 2022.01.31 Deposition Exhibit 31 - 12-14- 18, E-mail from Richard Barron to list re: Voting system input from Fulton County, and 1-3-19 E-mail from Joseph Kirk to list re: My thoughts about our next voting system.	Deposition Exhibit
117	Barron, Richard 2022.01.31 Deposition Exhibit 32 (Exhibit Withdrawn by counsel)	Deposition Exhibit
118	Barron, Richard 2022.01.31 Deposition Exhibit 33 - 09.17.19 Email string from Gabriel Sterling to Chris harvey re: Fulton County ExpressPolls	Deposition Exhibit
119	Barron, Richard 2022.01.31 Deposition Exhibit 34 - 11.02.2020, Seven Hills Strategies report re: State Election Board	Deposition Exhibit

Exhibit No.	Document Description	Document Type
120	Barron, Richard 2022.01.31 Deposition Exhibit 35 - 01.12.2021 Seven Hills Strategies reort re: State Election Board - Post Election Executive Summary	Deposition Exhibit
121	Beaver, Merritt 2022.02.22 Deposition Exhibit 1 - Curling Plaintiffs'Second AMD NOD of the Office of the Secretary of State	Deposition Exhibit
122	Beaver, Merritt 2022.02.22 Deposition Exhibit 2 - Declaration of Merritt Beaver	Deposition Exhibit
123	Beaver, Merritt 2022.02.22 Deposition Exhibit 3 - Declaration of S. Merritt Beaver	Deposition Exhibit
124	Beaver, Merritt 2022.02.22 Deposition Exhibit 4 - LinkedIn Printout of Merritt Beaver's profile page	Deposition Exhibit
125	Beaver, Merritt 2022.02.22 Deposition Exhibit 5 - AJC article entitled Case files discredit Kemp's accusation that democrats tried to hack Georgia election	Deposition Exhibit
126	Beaver, Merritt 2022.02.22 Deposition Exhibit 6 - 07.01.2020 email string the with top from Kevin Robertson	Deposition Exhibit
127	Beaver, Merritt 2022.02.22 Deposition Exhibit 7 - Email string dated 12/02/2020 with the top from Kay Stinson	Deposition Exhibit

Exhibit No.	Document Description	Document Type
128	Beaver, Merritt 2022.02.22 Deposition Exhibit 8 - ImageCast X ballot marking device document	Deposition Exhibit
129	Beaver, Merritt 2022.02.22 Deposition Exhibit 9 - Document entitled Information Technology Security Program Charter	Deposition Exhibit
130	Beaver, Merritt 2022.02.22 Deposition Exhibit 10 - Document dated 07.14.2020 entitled Fortalice Solutions Web Vulnerability Remediation Checks Secretary of State Georgia draft	Deposition Exhibit
131	Beaver, Merritt 2022.02.22 Deposition Exhibit 11 - 07.10.2020 Email string with the top from Dave Hamilton	Deposition Exhibit
132	Beaver, Merritt 2022.02.22 Deposition Exhibit 12 - E- mail string with the top from Chris Furtick dated 11.02.2020	Deposition Exhibit
133	Beaver, Merritt 2022.02.22 Deposition Exhibit 13 - 04.05.2019 email string with the top from Kevin Rayburn	Deposition Exhibit
134	Beaver, Merritt 2022.02.22 Deposition Exhibit 14 - 2019.04.03 Emal string with the top from Josh Hood	Deposition Exhibit
135	Beaver, Merritt 2022.02.22 Deposition Exhibit 15 - 08.13.2020 email string with the top from Dave Hamilton	Deposition Exhibit

Exhibit No.	Document Description	Document Type
136	Beaver, Merritt 2022.02.22 Deposition Exhibit 16 - 12.30.2020 Email string with the top from Chris Harvey	Deposition Exhibit
137	Beaver, Merritt 2022.02.22 Deposition Exhibit 17 - 12.21.2020 E-mail string with the top from Dave Hamilton	Deposition Exhibit
138	Beaver, Merritt 2022.02.22 Deposition Exhibit 18 - 2020 Security of the voter registration system artifacts and attestation pursuan to Rule 590-8-3-01	Deposition Exhibit
139	Beaver, Merritt 2022.02.22 Deposition Exhibit 19 - 08.21.2020 Email from Dave Hamilton	Deposition Exhibit
140	Beaver, Merritt 2022.02.22 Deposition Exhibit 20 - 12.31.2020 Email string with the top from Angelos Keromytis	Deposition Exhibit
141	Beaver, Merritt 2022.02.22 Deposition Exhibit 21 - 09.17.2020 Email string with the top from Terry Jones	Deposition Exhibit
142	Beaver, Merritt 2022.02.22 Deposition Exhibit 22 - Document entitled Fortalice Rules of Enagement of Georgia Secretary of State Memorandum	Deposition Exhibit
143	Beaver, Merritt 2022.03.10 Deposition Exhibit 23 - 07.29.2020 Email striing with the top from Dave Hamilton	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	Document Description	Document Type
144	Beaver, Merritt 2022.02.22	Deposition Exhibit
	Deposition Exhibit 24 -	- oposition
	11.12.2020 Email string with	
	the top from Merritt Beaver	
145	Beaver, Merritt 2022.02.22	Deposition Exhibit
	Deposition Exhibit 25 -	•
	11.03.2020 email Email from	
	Jason Matthews	
146	Beaver, Merritt 2022.03.10	Deposition Exhibit
	Deposition Exhibit 26 -	_
	08.14.2020 Email string with	
	the top from Kevin Robertson	
147	Beaver, Merritt 2022.02.22	Deposition Exhibit
	Deposition Exhibit 27 -	
	03.03.2019 Email string with	
	the top from Merritt Beaver	
148	Beaver, Merritt 2022.02.22	Deposition Exhibit
	Deposition Exhibit 28 -	
	08.14.2020 Email from Nick	
	Salsman	
149	Beaver, Merritt 2022.02.22	Deposition Exhibit
	Deposition Exhibit 29 -	
	2020.06.15 Document entitled	
	Election Office Notes	
150	Beaver, Merritt 2022.03.10	Deposition Exhibit
	Deposition Exhibit 1 -	
	2020.05.19 Fortalice Solutions	
	Technical Assessment	
	Prepard for Secretary of State	
1 7 1	Georgia DRAFT	Descrition Fabilit
151	Beaver, Merritt 2022.03.10	Deposition Exhibit
	Deposition Exhibit 2 - 2020.07.09 Fortalice Solutions	
	Firmware Comparison and Configuration Analysis,	
	Secretary of Sate Georgia,	
	DRAFT	
	DIMIT I	

Exhibit No.	Document Description	Document Type
152	Beaver, Merritt 2022.03.10 Deposition Exhibit 3 - 08.25.2020 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia, DRAFT	Deposition Exhibit
153	Beaver, Merritt 2022.03.10 Deposition Exhibit 4 - 08.25.2020 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia, DRAFT	Deposition Exhibit
154	Beaver, Merritt 2022.03.10 Deposition Exhibit 5 - 08.25.2020 Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia, DRAFT	Deposition Exhibit
155	Beaver, Merritt 2022.03.10 Deposition Exhibit 7 - 11.25.2020 Secretary of State Georgia, Fulton County Laptop Forensic Review	Deposition Exhibit
156	Beaver, Merritt 2022.03.10 Deposition Exhibit 8 - Email string	Deposition Exhibit
157	Beaver, Merritt 2022.03.10 Deposition Exhibit 9 - Email String	Deposition Exhibit
158	Beaver, Merritt 2022.03.10 Deposition Exhibit 10 - 07.01.2021 Security Analysis of Georgia's ImageCast X Ballot Marking Devices, Expert Report Submitted on Behalf of Plaintiffs Donna Curling, et al., authored by Prof.J. Alex Halderman,	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Ph.D. with theassistance of Prof. Drew Springall, Ph.D.	
159	Beaver, Merritt 2022.03.10 Deposition Exhibit 11 - Curling Plaintiffs' Fifth AMD NOC of Office of the Secretary of State	Deposition Exhibit
160	Beaver, Merritt 2022.03.10 Deposition Exhibit 12 - CGG Recording	Deposition Exhibit
161	Beaver, Merritt 2022.03.10 Deposition Exhibit 13 - 11.17.2020 Official Election Bulletin, dated November 17, 2020, from Chris Harvey, Elections DivisionDirector, to County Election Officials and County Registrars RE: Open Records Requests - Security Information Exempt	Deposition Exhibit
162	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition Exhibit 1 - Notice of Deposition	Deposition Exhibit
163	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6)	Deposition Exhibit

Exhibit No.	Document Description	Document Type
110.	Deposition- Deposition Exhibit 2 - Objections to NOD	
164	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 3 - Plaintiffs' Third AMD Complaint	Deposition Exhibit
165	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 4 - First Supplemental Complaint of Plaintiffs Coalition for Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett	Deposition Exhibit
166	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 5 - Supplemental Declaration of Marilyn Marks	Deposition Exhibit
167	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 6 - 2017 Form 990-EZ	Deposition Exhibit
168	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 7 - 2018 Form 990	Deposition Exhibit

Exhibit	Document Description	Document Type
169	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 8 - 2019 Form 990	Deposition Exhibit
170	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 9 - Plaintiffs' Notice of Filing Declaration	Deposition Exhibit
171	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 10 - Coalition Plaintiffs' Detailed Specification In Support of Motion for Attorneys' Fees	Deposition Exhibit
172	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 11 - New York correspondence from January 2021 citing Curling	Deposition Exhibit
173	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 12 - NCSBOE letter from 2019	Deposition Exhibit
174	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 13 - E-mails, 9/26/19, CGG2021001277506	Deposition Exhibit

Exhibi	Document Description	Document Type
No.		
175	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	-
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 14 - 3/4/21 letter from	
	CGG to	
	Georgia Republican Leaders	
176	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition Deposition	
	Exhibit 15 - Mission	
	Statement - Coalition	
177	for Good Governance Coalition for Good	Deposition Exhibit
111	Governance through Marilyn	Deposition Exhibit
	Marks - 2022.03.17 30(b)(6)	
	Deposition Deposition	
	Exhibit 16 - Articles of	
	Incorporation for	
	a Nonprofit Corporation	
178	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 17 - Who We Are -	
	Coalition for	
150	Good Governance	D W D Lili
179	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition - Deposition Exhibit 18 - CGG Board	
	Discussion Package	
180	Coalition for Good	Deposition Exhibit
100	Governance through Marilyn	Deposition Eximit
	Marks - 2022.03.17 30(b)(6)	
	Deposition Deposition	

Evhihit	Document Description	Document Type
No.	Document Description	Document Type
110.	Exhibit 19 - Fundraising message	
181	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 20 - Fundraising message during 2020	Deposition Exhibit
182	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 21 - Donate - Coalition for Good Governance	Deposition Exhibit
183	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 22 - Home page - Coalition for GoodGovernance	Deposition Exhibit
184	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 23 - Current Projects - Coalition for Good Governance	Deposition Exhibit
185	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 24 - Tweets from January 24, 2021	Deposition Exhibit

Exhibi	Document Description	Document Type
No.	Document Description	Document Type
186	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	•
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 25 - 8/22/20 tweet	
187	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 26 - E-mails, 1/18/18	
	CGG2021001278172	
188	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition Deposition	
	Exhibit 27 - Supplemental	
100	Response to Rog 12	D D 1.1
189	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition Deposition Exhibit 28 -Coalition	
	Plaintiffs'Responses to	
	Defendant Anh Le's First	
	Interrogatories	
190	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	Deposition Eximple
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 29 - Joint Litigation	
	and Common Interest	
	Agreement	
191	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 30 - Facebook	
	advertisement from Friends	

Exhibit No.	Document Description	Document Type
	of Coalition for Good	
	Governance	
192	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	•
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 31 - E-mail regarding	
	ballot image	
	legislation	
193	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition Deposition	
	Exhibit 32 - E-mails, 8/24/21,	
	Subject:	
	Garland's new lawsuit	
194	against BMDs Coalition for Good	Deposition Exhibit
194	Governance through Marilyn	Deposition Exhibit
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 33 - January 1, 2021	
	tweet	
195	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	-
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 34 - Coalition for	
	Good	
	Governance's and Coalition	
	Plaintiffs' Objections and	
	Responses to Defendant Brad	
	Raffensperger's First Request	
	for Admission	

Exhibit	Document Description	Document Type
No.	Document Description	Document Type
196	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	•
	Marks - 2022.03.17 30(b)(6)	
	Deposition Deposition	
	Exhibit 35 - 12.30.2020 GA	
	Senate Judiciary Sub-	
	Committee on Election Law	
197	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 36 - Plaintiff Coalition	
	for Good	
	Governance's Objections and	
	Responses to State	
	Defendants'	
	Second Request for	
	Production	
	of Documents	
198	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition- Deposition	
	Exhibit 37 - Response of	
	Coalition for Good	
	Governance to Brad	
	Raffensperger's First	
199	Coalition for Good	Deposition Exhibit
	Governance through Marilyn	
	Marks - 2022.03.17 30(b)(6)	
	Deposition Deposition	
	Exhibit 38 - Handwritten	
	notes	
200	2021.09.28 Deposition of	Deposition Exhibit
	Megan Missett - Deposition	
	Exhibit 1 - Notice of	
	Deposition	

Exhibit No.	Document Description	Document Type
201	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 2 - Ms. Missett's Voting Record	Deposition Exhibit
202	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 3 - Declaration of Megan Missett, 10/20/19	Deposition Exhibit
203	2021.09.28 Deposition of Megan Missett - Deposition Exhibit 4 - Declaration of Megan Missett, 5/21/19	Deposition Exhibit
204	2022.01.17 Deposition of James Oliver - Deposition Exhibit 1 - Organization Chart	Deposition Exhibit
205	2022.01.17 Deposition of James Oliver - Deposition Exhibit 2 - LinkedIn Profile of james Oliver	Deposition Exhibit
206	2022.01.17 Deposition of James Oliver - Deposition Exhibit 3 - Fortalice Task Order dated 3/11/21	Deposition Exhibit
207	2022.01.17 Deposition of James Oliver - Deposition Exhibit 4 - Email Chain dated October 2018	Deposition Exhibit
208	2022.01.17 Deposition of James Oliver - Deposition Exhibit 5 - Email Chain dated August 2016	Deposition Exhibit
209	2022.01.17 Deposition of James Oliver - Deposition Exhibit 6 - 2020 Rule 590-8.3 Attestation	Deposition Exhibit
210	2022.01.17 Deposition of James Oliver - Deposition	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	P	J. T.
	Exhibit 7 - Email Chain dated	
	April 2019	
211	2022.01.17 Deposition of	Deposition Exhibit
	James Oliver - Deposition	
	Exhibit 8 - Email Chain dated	
	October 2019	
212	2022.01.17 Deposition of	Deposition Exhibit
	James Oliver - Deposition	
	Exhibit 9 - Email Chain dated	
213	July 2019 2022.01.17 Deposition of	Deposition Exhibit
213	James Oliver - Deposition	Deposition Exhibit
	Exhibit 10 - Email Chain	
	dated April 2019	
214	2022.01.17 Deposition of	Deposition Exhibit
	James Oliver - Deposition	•
	Exhibit 11 - Email dated	
	4/24/19	
215	2022.01.17 Deposition of	Deposition Exhibit
	James Oliver - Deposition	
	Exhibit 12 - Email Chain	
01.0	dated April 2019	D ': E111:
216	2022.01.21 Deposition of	Deposition Exhibit
	Dominic Olomo - Deposition Exhibit 1 - Curling	
	Plaintinff's Third Amended	
	Notice of Deposition of Fulton	
	County Defendants	
217	2022.01.21 Deposition of	Deposition Exhibit
	Dominic Olomo - Deposition	_
	Exhibit 2 - Email string to	
	Tucker from evans 9/29/20	
218	2022.01.21 Deposition of	Deposition Exhibit
	Dominic Olomo - Deposition	
	Exhibit 3 - Email to Harvey	
	from Spell-Forlwer 10/27/20	

Exhibit	Document Description	Document Type
219	2022.03.08 Deposition of	Deposition Exhibit
210	Donna Price - Exhibit 1 -	Deposition Eximate
	Notice of Deposition	
220	2022.03.08 Deposition of	Deposition Exhibit
	Donna Price - Exhibit 2 -	Deposition Eximite
	Georgians for Verified Voting	
221	2022.03.08 Deposition of	Deposition Exhibit
	Donna Price - Exhibit 3 -	Deposition Emiliar
	Voter History File	
222	2022.03.08 Deposition of	Deposition Exhibit
	Donna Price - Exhibit 4 -	
	Third Amended Complaint	
223	2022.03.08 Deposition of	Deposition Exhibit
	Donna Price - Exhibit 6 -	P
	Delcaration dated 8/17/18	
224	2022.03.08 Deposition of	Deposition Exhibit
	Donna Price - Exhibit 7 -	•
	Declaration dated 5/29/18	
225	2022.03.08 Deposition of	Deposition Exhibit
	Donna Price - Exhibit 8 -	_
	Declaration dated 10/4/19	
226	2022.03.08 Deposition of	Deposition Exhibit
	Donna Price - Exhibit 10 -	
	Declaration dated 8/19/20	
227	2022.03.08 Deposition of	Deposition Exhibit
	Donna Price - Exhibit 11 -	
	Declaration dated 2/12/21	
228	2022.03.08 Deposition of	Deposition Exhibit
	Donna Price - Exhibit 12 -	
	Absentee Ballot Report	
229	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 1 -	
	DouglasNow news article, Re:	
	Hampton & Ridlehoover	
	resignation	
230	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 2 -	
	Ridlehoover subpoena	

Exhibit	Document Description	Document Type
No.	_	
231	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 3 - Jil	
	Screenshot at 5.19 of Video 2	
232	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 4 -	
	Dominion Voting Machine	
	Flaws 2020 Election Coffee	
	County	
233	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 5 -	
	Screenshot 2 (sportcoat)	
234	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 6 -	
	Screenshot of Scott Hall	
235	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 7 -	
	Screenshot of Jennifer	
222	Jackson	D D 141.
236	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 8 -	
007	Screenshot of Paul Maggio	D '4' F 1.1'4
237	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 9 -	
000	Screenshot of Doug Logan	D '4' F 1.1'4
238	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 10 -	
000	Screenshot of Greg Freemyer	D
239	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 11 -	
940	Screenshot of Russ Ramsland	Danasitian Euhihit
240	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 12 -	
0.41	Screenshot of Jeffrey Lenberg	Donosition Euclide
241	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 13 -	Deposition Exhibit
	Screenshot 3	

Fyhihi	Document Description	Document Type
No.	Document Description	Document Type
242	2022.08.16 Deposition of Jil	Deposition Exhibit
242	Ridlehoover - Exhibit 14 -	Deposition Exhibit
	Email string from Frances	
	Watson to Pamela Jones,	
	<u> </u>	
243	dated May 11, 2021	Denogition Exhibit
243	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 15 -	Deposition Exhibit
	Election Database Memo re:	
0.4.4	Passwords	D
244	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 16 -	
	Misty Hampton Messages	
0.45	with Eric Chaney	D '4' E 1'1'4
245	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 17 -	
2.40	Text Messages	D D 1 1 1
246	2022.08.16 Deposition of Jil	Deposition Exhibit
	Ridlehoover - Exhibit 18 -	
	Texts Reveal GOP Mission to	
	Breach Voting Machine in	
0.45	Georgia - Daily Beast	7.111
247	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit 1	
	- Notice of Deposition	
248	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit 2	
	- Verified Complaint	
249	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit 3	
	- Verified Amended	
	Complaint	
250	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit 4	
	- Second Amended Complaint	
251	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit 5	
	- Third Amended Complaint	

Exhibit	Document Description	Document Type
No.	T. C.	J. T.
252	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit 6	_
	- ENET Report	
253	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit 7	
	- Absentee Ballot Report	
254	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit 8	
	- " An Update on Georgia's	
	Election Integrity Lawsuit"	
	10/11/19	
255	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit 9	
	- "Daniel Blackman Named	
	EC Chair of Sierra Club,	
2 7 2	Georgia Chapter"	7.111
256	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit	
	10 - Declaration 8/19/20	D D 1 1 1
257	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit	
050	11 - Declaration 8/7/18	D
258	2021.10.19 Deposition of	Deposition Exhibit
	Jeffrey Schoenberg - Exhibit	
250	12 - Email Chain	Donosition Eulibit
259	2019.07.19 Deposition of	Deposition Exhibit
	Michael Ian Shamos - Plaintiffs Exhibit 73 -	
	Declaration of Michael	
	Shamos	
260	2019.07.19 Deposition of	Deposition Exhibit
200	Michael Ian Shamos -	Deposition Eximate
	Plaintiffs Exhibit 74 -	
	Powerpoint entitled,	
	Cybersecurity Considerations	
	for Voting Systems, Wenke	
	Lee, Ph.D.	

Evhibit	Document Description	Document Type
No.	Document Description	Document Type
261	2019.07.19 Deposition of	Deposition Exhibit
201	Michael Ian Shamos -	Doposition Damoit
	Plaintiffs Exhibit 75 -	
	Cloudbust Security document	
	entitled, Office of the Georgia	
	Secretary of State Cyber Risk	
	Assessment October 2017	
262	2019.07.19 Deposition of	Deposition Exhibit
	Michael Ian Shamos -	1
	Plaintiffs Exhibit 76 -	
	Fortalice document	
263	2019.07.19 Deposition of	Deposition Exhibit
	Michael Ian Shamos -	_
	Plaintiffs Exhibit 77 - Diebold	
	in the News - A Partial List of	
	Documented Failures	
264	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 1 -	
	LinkedIn Profile	
265	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 2 -	
	08122022-000034 through	
	08122022-000053	
266	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 3 -	
	08122022-000110 through	
	08122022-000122	
267	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 4 -	
	08122022-000162 through	
200	08122022-000174	D W D Lili
268	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 5 -	
	E-mail thread, Harry	
	MacDougald, dated November	
	10, 2020	

Exhibit	Document Description	Document Type
No.	•	V 1
269	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 6 -	_
	Email thread from Harry	
	MacDougald, dated November	
	10, 2020	
270	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 7 -	
	Excerpt of Misty Hampton's	
	messages	
271	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 8 -	
	E-mail from Eric Chaney,	
	November 11, 2020	
272	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 9 -	
	E-mail thread, Tracie Vickers,	
	December 3, 2020	
273	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 10 -	
	E-mail thread, David Shafer,	
	November 20, 2020	7.11
274	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 11 -	
	November 11, 2020 letter to	
075	Brad Raffensperger	D ': E 1:1:4
275	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 12 -	
	Email Thread to Eric Chaney	
276	December 8, 2020	Denosition Exhibit
210	2022.09.28 Deposition of Robert Sinners - Exhibit 13 -	Deposition Exhibit
	December 2, 2020, Misty	
	Hampton e-mailing Sinner re:	
	Trump Campaign	
277	2022.09.28 Deposition of	Deposition Exhibit
- ' '	Robert Sinners - Exhibit 14 -	Doposition Damoit
	December 13, 2020 Sinners	
	text messages with Alex	
	Kaufman	
		

	Document Description	Document Type
No.		
278	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 15 -	
	Washington Post Article -	
	Fake Trump Electors in	
	Georgia told to Shroud Plans in Secrecy	
279	2022.09.28 Deposition of	Deposition Exhibit
213	Robert Sinners - Exhibit 16 -	Deposition Eximate
	Germany Declaration	
280	2022.09.28 Deposition of	Deposition Exhibit
200	Robert Sinners - Exhibit 17 -	Deposition Eximate
	Raffensperger: Coffee County	
	Probe Stalled Because Local	
	Officials Lied	
281	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 18 -	
	Doug Richards Short Version	
282	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 19 -	
	Questions Raised in Timeline	
	of State Response to Coffee	
	County Breach	
283	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 20 -	
	Questions Raised in Timeline	
	of State Response to Coffee	
994	County Breach	Danasitian Ershihit
284	2022.09.28 Deposition of Robert Sinners - Exhibit 21 -	Deposition Exhibit
	May 7, 2021 Barnes E-mail	
	Chain re Cyber Ninjas	
285	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 22 -	Doposition Lambiu
	Excerpt from deposition of	
	Michael Ian Shamos	
286	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 23 -	_
	MITRE Report	

Exhibit	Document Description	Document Type
No.	Bocament Bescription	Bootiment Type
287	2022.09.28 Deposition of Robert Sinners - Exhibit 24 - May 20, 2021 Sinners Email to Fuchs	Deposition Exhibit
288	2022.09.28 Deposition of Robert Sinners - Exhibit 25 - March 3, 2021 Sinners asked to draft more responses	Deposition Exhibit
289	2022.09.28 Deposition of Robert Sinners - Exhibit 26 - 4/13/22 texts between Sinners and Marshall regarding Sterling Deposition	Deposition Exhibit
290	2022.09.28 Deposition of Robert Sinners - Exhibit 27 - Sinners emails in response to media requests	Deposition Exhibit
291	2022.09.28 Deposition of Robert Sinners - Exhibit 28 - 2021 Convention Resolutions Committee Report	Deposition Exhibit
292	2022.09.28 Deposition of Robert Sinners - Exhibit 29 - Text messages between Sinners and Gardner	Deposition Exhibit
293	2022.09.28 Deposition of Robert Sinners - Exhibit 30 - Pictures, SOS Investigator Visit	Deposition Exhibit
294	2022.09.28 Deposition of Robert Sinners - Exhibit 31 - Kaufman email to Sinners	Deposition Exhibit
295	2022.09.28 Deposition of Robert Sinners - Exhibit 32 - Affidavit of Alyssa Hope Taylor	Deposition Exhibit

	Document Description	Document Type
No.	2022 00 20 D	D ::: F 1:1::
296	2022.09.28 Deposition of Robert Sinners - Exhibit 33 -	Deposition Exhibit
	Presidential Findings to	
	Preserve Collect and Analyze	
	National Security Information	
	Regarding the 2020 General	
	election	
297	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 34 -	_
	Still Lawsuit	
298	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 35 -	
	Shawn Still Motion	
299	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 36 -	
	O.C.G.A. 21-2-524(b)	
	Certificate of Service of	
	Summons, Petition and Discovery	
300	2022.09.28 Deposition of	Deposition Exhibit
000	Robert Sinners - Exhibit 37 -	Deposition Lambit
	Shawn Still e-mail, December	
	15, 2020	
301	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 38 -	_
	Email from Christina Read,	
	December 10, 2020	
302	2022.09.28 Deposition of	Deposition Exhibit
	Robert Sinners - Exhibit 39 -	
	Email thread, Christina	
202	Norton, January 1, 2021	Deposition Fabilit
303	2022.12.16 Deposition of	Deposition Exhibit
	Kevin Skoglund - Exhibit 1 - Skoglund Declaration	
	Confidential	
304	2022.12.16 Deposition of	Deposition Exhibit
	Phillip Stark - Exhibit 1 -	2 oposition immore
	Notice of Deposition	

Exhibit	Document Description	Document Type
No.	Bocament Bescription	Boddine Type
305	2022.12.16 Deposition of	Deposition Exhibit
	Phillip Stark - Exhibit 2 -	•
	Supplemental Report 66	
306	2022.12.16 Deposition of	Deposition Exhibit
	Phillip Stark - Exhibit 3 -	-
	Tabulating Results	
307	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 1 - Fourt Amended	
	Notice of Deposition	
308	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 2 - LinkedIn Web	
	Page	
309	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 3 - Excerpted pages of	
	"Integrity Counts" By	
	Raffensperger	
310	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 4 - Video excerpts of	
	speech by Gabrial Sterling re:	
011	Universite de geneve function	D '': E 1:1:4
311	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 5 - 7/15/19 State Def's	
	objections and reposes to	
	Curling Plaintiffs' First Set of	
312	Interrogatories	Danagitian Exhibit
314	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) -	Deposition Exhibit
	Exhibit 6 - State Defs'	
	Responses and Objections to	
	Curling Plaintiffs' Second Set	
	of Interrogatories	
	or interrogatories	

Exhibit No.	Document Description	Document Type
313	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 7 - State Defendants Responses to First Requests for Admissions	Deposition Exhibit
314	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 8 - State Defendants 113751	Deposition Exhibit
315	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 9 - State Defendants 172679 thru 686	Deposition Exhibit
316	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 10 - State Defendants 169353	Deposition Exhibit
317	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 11 - State Defendants 192602 thru 603.	Deposition Exhibit
318	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 12 - Audio recording of telephone call.	Deposition Exhibit
319	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 17 - State-Defendants 11151729 thru 781.	Deposition Exhibit
320	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 18 - Dominion Voting brochure re: Mobile ballot printing.	Deposition Exhibit
321	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 19 - Georgia Code 21- 2-498	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	Document Description	Document Type
322	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
022	of SOS (Gabriel Sterling) -	Doposition Emilian
	Exhibit 20 - Rule 183-1-1504	
323	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	_ op
	Exhibit 21 - Arlo Document	
	regarding Ballot manifest.	
324	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	•
	Exhibit 22 - 11-19-20 - Excel	
	Spreadsheet regarding Arlo	
	Audit report	
325	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	_
	Exhibit 23 - State of Georgia	
	letterhead from Brian Kemp	
	to members of State Election	
	Board regarding 2020 election	
326	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 24 - Audit Board	
	Batch Sheet re: DeKalb	
	Tucker Election Day	
327	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 25 - Audit Board	
	Batch Sheet regarding	
	DeKalb Tucker Library	
226	Advance	D. W. B.H.
328	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
000	Exhibit 26	D '' E 1 '1'
329	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 27 - Audit Board	
	Batch Sheet re: DeKalb 2339	
	Absentee	

Exhibit	Document Description	Document Type
No.	Document Description	Boddine Type
330	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) -	Deposition Exhibit
	Exhibit 28 - Audit Board	
	Batch Sheet regarding	
	DeKalb 1956 Absentee	
331	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 29 - Audit Board	
	Batch Sheet regarding DeKalb 1836 Absentee	
332	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
002	of SOS (Gabriel Sterling) -	Deposition Lambit
	Exhibit 30 - Senators Walker	
	and Blackmon to members of	
	the State Election Board	
	regarding 2020 election	
333	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
00.4	Exhibit 31	D D 1.1
334	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) - Exhibit 32 - Fox5Atlanta Web	
	Page article regarding	
	Software glitch cuases delay	
	in counting thousands of votes	
	in Gwinnett County	
335	2022.02.24 30(b)(6) Deposition	Deposition Exhibit
	of SOS (Gabriel Sterling) -	
	Exhibit 33 - Whittier Daily	
	News web page article by	
	Conny McCormack - A behind	
	the scenes look at Georgia's	
336	vote counting. 2022.10.12 30(b)(6) SOS	Deposition Exhibit
990	(Gabriel Sterling) - Exhibit 1 -	Deposition Eximate
	Plaintiffs Seventh Amended	
	Notice fo Deposition	

Exhibit	Document Description	Document Type
No.	•	7
337	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 2 -	
	Report of Investigation of	
	Blanchard	
338	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 3 -	
	Photograph from Youtube	
	video of post-it with password	
339	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 4 -	
	Series of tweets by Sterling	
	responding to Adida's tweet	
340	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 5 -	
	2/10 transcript of Secretary	
	Raffensperger Interview	
341	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 6	
	- Still photo from the Carter	
	Center, Restoring Confidence	
	in American Elections Panel 3	
0.10	(April 29, 2022)	7.111
342	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 7 -	
	Email chain ending with	
0.46	5/11/21 from Watson to Jones	D W Blile
343	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 8 -	
	Letter from Ellis to Reynolds	
	regarding Request for	
0.4.4	Assistance in investigation	D '' E 1 1 1 1
344	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 9 -	
	Email chain from Germany to	
	Ellis regarding Server	

Exhibit	Document Description	Document Type
345	2022.10.12 30(b)(6) SOS	Deposition Exhibit
040	(Gabriel Sterling) - Exhibit 10	Deposition Exhibit
	- Email chain from sterling to	
	Miller regarding Curling v.	
	Raffensperger; 1:17-CV-2989	
346	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 11	•
	- Email from Germany to	
	ORR administration	
	regarding Open Records	
	Request	
347	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 12	
	- UTC Message from hampton	
	to Voyles titled ORR	
348	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 13	
	- Email from Germany to	
0.40	Tyson regarding GASOS ORR	D W DIN
349	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 14	
	- Email chain from Koth to	
	Ellis Regarding Opern Records Request	
350	2022.10.12 30(b)(6) SOS	Deposition Exhibit
300	(Gabriel Sterling) - Exhibit 15	Deposition Exhibit
	- Sheet for SEB2020-250-	
	Coffee	
	County Misc	
351	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 16	*
	- Interior stills taken from	
	video camera 1	
352	2022.10.12 30(b)(6) SOS	Deposition Exhibit
	(Gabriel Sterling) - Exhibit 17	
	- Still shots from video of	
	Coffee County election Board	
	office	

Exhibit No.	Document Description	Document Type
353	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 18 - Tweet by Juha regarding Mike Lindell's Plane Flights	Deposition Exhibit
354	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 19 - Excel Spreadsheet - IP Addresses that have downloaded CC data	Deposition Exhibit
355	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 20 - Email chain from Maggio to Federalattorney regarding Coffee County Forensics FedEx request	Deposition Exhibit
356	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 21 - Email from Brown to Belinfante regarding JSON Format Cast Vote Records on the Internet	Deposition Exhibit
357	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 22 - Email from Johnson to McClain regarding SullivanStrickler / Spalding County Board fo Elections	Deposition Exhibit
358	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 23 - Virtual Videotaped 30(b)(6) Deposition of Sanford Merritt Beaver	Deposition Exhibit
359	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 24 - Rolling Stone Article by Glawe "Pro-Trump Georgia Officials Plotted to Swipe Voting Data. We Caugh Them."	Deposition Exhibit

Exhibit No.	Document Description	Document Type
360	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 25 - Official Election Bulletin 11/17/20	Deposition Exhibit
361	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 26 - 12/9/20 Press Release from SOS regarding Opening investigation into Coffee County's handling recount	Deposition Exhibit
362	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 27 - Email from Favorito to Harding regarding Final Ballot inspection plan	Deposition Exhibit
363	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 28 - 5-5-21 Letter, to The Honorable Karen Fann, President, Arizona State Senate, from Karlan, Civil Rights Division, DOJ	Deposition Exhibit
364	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 29 - Dominion Voting, Customer Notification: Maintaining Secure Chain of Custory for Your Dominion Voting System	Deposition Exhibit
365	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 30 - Press Release - MITRE Corporation, an Independent Federal Lab, finds Georgia Election System Secure	Deposition Exhibit

Exhibit No.	Document Description	Document Type
366	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 31 - July 2022 MITRE Document - Independent Technical Review: Security Analysis of Georgia's ImageCast X Ballot Marking Devices	Deposition Exhibit
367	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 32 - E-mail Chain Ending with Wednesday, 8-18-21 12:49 PM E-mail, from Evans, to Johnson, et al., Subject: RE: Spalding County Equipment	Deposition Exhibit
368	2021.11.05 Deposition of Rebecca Sullivan - Exhibit 1 - 2/28/20 Meeint Minutes of SEB	Deposition Exhibit
369	2021.11.05 Deposition of Rebecca Sullivan - Exhibit 2 - Transcript from the SEB hearing on 1/22/20	Deposition Exhibit
370	2021.11.04 Deposition of Matthew Mashburn - Exhibit 1 - Meeting Minutes	Deposition Exhibit
371	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 1 - Subpeona to testitfy	Deposition Exhibit
372	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 2 - Picture of Jim Nelson	Deposition Exhibit
373	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 3 - Picture of Jennifer Jackson	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	•	V 1
374	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 4 - Picture of karuna Naik	Deposition Exhibit
375	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 5 - Picture of Paul Maggio	Deposition Exhibit
376	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 6 - Engagement Agreement 11/30/20	Deposition Exhibit
377	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 7 - Engagement Agreement, MI, AZ, December 6, 2020	Deposition Exhibit
378	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 8 - January 8, 2021 Maggio email chain invoice	Deposition Exhibit
379	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 9 - Phone text message 8/12/22	Deposition Exhibit
380	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 10 - Coffee County Board of Elections and Registration Elections Office Security Video 1/7/21	Deposition Exhibit
381	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 11 - January 8, 2021 from 5pm to 6pm missing video	Deposition Exhibit

Exhibit No.	Document Description	Document Type
382	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 12 - Bates numbers 08122022 000236 to 265	Deposition Exhibit
383	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 13 - Password Memos, 08122022-000123 through 125	Deposition Exhibit
384	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 14 - Maggio hard drive contents	Deposition Exhibit
385	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 15 - 8/17/22 Maggio Production Folder Structure	Deposition Exhibit
386	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 16 - Bates Numbers 08122022-000126 through 136	Deposition Exhibit
387	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 17 - 08122022-000137 through 161	Deposition Exhibit
388	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 18 - Bates Numbers 08122022-000175 through 176	Deposition Exhibit
389	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 19 - Bates Numbers 08122022-000098 through 105	Deposition Exhibit
390	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 20 - Bates Numbers 08122022-000204 through 205	Deposition Exhibit
391	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) -	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Exhibit 21 - Excel Attachment 08122022-000205	
392	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 22 - Bates Numbers 08122022-000022 through 33	Deposition Exhibit
393	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 23 - Maggio-000057 58 Excel	Deposition Exhibit
394	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 24 - May 7, 2021 Barnes e-mail chain re: Cyber Ninjas	Deposition Exhibit
395	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 25 - subpoena	Deposition Exhibit
396	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 26 - STATE- DEFENDANTS-001 01937	Deposition Exhibit
397	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 27 - ICS Advisory Vulnerabilities Affecting Dominion Voting System ImageCast X	Deposition Exhibit
398	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 28 - Copy of Check to Defending the Republic	Deposition Exhibit
399	2022.11.16 Deposition of Blake Voyles - Exhibit 1 - Subpoena	Deposition Exhibit
400	2022.11.16 Deposition of Blake Voyles - Exhibit 2 - Ed	Deposition Exhibit

Exhibi	Document Description	Document Type
No.	P	J. P.
	Voyles November 2020	
	Election 23 Office Visits	
401	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 3 -	
	CGG20220001857 to 858	
402	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 4 - 1-8-	
	21 e-mail, Voyles to Holmes	
403	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 5 - 11-	
	16-20 e-mail, Hampton to	
	Voyles	7.111
404	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 6 - 12-	
	16-20 e-mail, redacted to	
405	bemarkdkerik	Danasitian Enhibit
400	2022.11.16 Deposition of Blake Voyles - Exhibit 7 - 12-	Deposition Exhibit
	21-20 e-mail, to Voyles	
406	2022.11.16 Deposition of	Deposition Exhibit
100	Blake Voyles - Exhibit 8 -	Beposition Eximite
	SOS Opens Investigation into	
	Coffee County's Handling	
	recount	
407	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 9 -	
	CGG20220002034 to 035	
408	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 10 -	
	Photographs	
409	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 11 -	
	photographs	
410	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 12 -	
	photographs	

Exhibit	Document Description	Document Type
No.		Bootimont Type
411	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 13 -	•
	Rule 183-1-1205	
412	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 14 - 3-	
	8-21 text message, Voyles to	
	Marks	
413	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 15 - 2-	
	19-21 combined text messages	
	folder	
414	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 16 - 12-	
	16-20 e-mail, Voyles to	
	Chaney	
415	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 17 - 1-	
41.0	4-21 text message, Thomas	D
416	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 18 - 1-	
41.77	7-21 2:19 p.m. photographs	D ': E 1:1:
417	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 19 - 12-	
410	7-20 10:28 a.m. photographs	D
418	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 20 - 12-	
419	8-20 e-mail, Voyles to Foskey 2022.11.16 Deposition of	Deposition Exhibit
410	Blake Voyles - Exhibit 21 - 1-	Deposition Eximple
	6-21 4:17 p.m. photographs	
420	2022.11.16 Deposition of	Deposition Exhibit
120	Blake Voyles - Exhibit 22 - 1-	Doposition Damoit
	8-21 e-mail, Voyles to Holmes	
421	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 23 - 12-	
	8-20 e-mail, Summers to	
	Voyles	
	, 0, 100	

	Document Description	Document Type
No.		
422	2022.11.16 Deposition of	Deposition Exhibit
	Blake Voyles - Exhibit 24 - 12-	
100	8-20 e-mail, Voyles to Carden	D
423	2022.08.31 Deposition of	Deposition Exhibit
	Edward Lindsey - Exhibit 1 -	
	June 15 Proposed Redactions,	
10.1	Halderman Report	D
424	2022.08.31 Deposition of	Deposition Exhibit
	Edward Lindsey - Exhibit 2 -	
	Excerpt from 10/29/2021	
405	Transcript of Juan Gilbert	D ':
425	2022.08.31 Deposition of	Deposition Exhibit
	Edward Lindsey - Exhibit 3 -	
400	State-Defendants-00202234	Danasitian Enhilit
426	2022.08.31 Deposition of	Deposition Exhibit
	Edward Lindsey - Exhibit 4 - State Defendants 00202239	
427		Donosition Exhibit
421	2022.08.31 Deposition of Edward Lindsey - Exhibit 5 -	Deposition Exhibit
	· ·	
	Article, "Pro-Trump tech team copied Georgia election data,	
	records show"	
428	2022.08.31 Deposition of	Deposition Exhibit
420	Edward Lindsey - Exhibit 6 -	Deposition Exhibit
	Video clip, Restoring	
	Elections Panel	
429	2022.08.31 Deposition of	Deposition Exhibit
120	Edward Lindsey - Exhibit 7 -	Doposition Damoit
	May 7, 2021 Barnes E-mail	
	Chain re: Cyber Ninjas	
430	2022.08.31 Deposition of	Deposition Exhibit
	Edward Lindsey - Exhibit 8 -	
	Excerpt from James A.	
	Barnes, Jr. transcript	
431	2022.08.31 Deposition of	Deposition Exhibit
		*
	State Defendants 00205051-	
	53	
431	Edward Lindsey - Exhibit 9 - State Defendants 00205051-	Deposition Exhibit

Exhibit	Document Description	Document Type
No.		
432	2022.08.31 Deposition of	Deposition Exhibit
	Edward Lindsey - Exhibit 10 -	
	State Defendants 202613	
433	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 1 - 7/27/22	
	Ichter Davis Letter	
434	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 2 - 4/19/21	
	Board of Selectment Meeting	
435	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 3 - Logan	
10.0	Messaging Thread	D. III
436	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 4 - Logan	
405	Messaging Thread	D D 1.1
437	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 5 - Data Log	
438	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 6 -	
	SullivanStrickler Log Files	
439	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 7 -	
	Photographs	
440	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 8 - 1/8/21	
	Email String From Paul	
4.41	Maggio To Sidney Powell	D ':
441	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 9 - screenshot	
442	2022.11.18 Deposition of Doug	Deposition Exhibit
	Logan - Exhibit 10 - Coalition	
	Plaintiffs' Response on Brief	
	on Law Enforcement	
	Investigative	
443	2022.11.21 Deposition of	Deposition Exhibit
	Jeffrey Lenberg - Exhibit 1 -	
	subpoena	

Exhibit No.	Document Description	Document Type
1NO. 444	2022 11 21 Denogition of	Denosition Exhibit
444	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 2 -	Deposition Exhibit
	Jeffrey Lenberg Declaration	
	October 21, 2022	
445	2022.11.21 Deposition of	Deposition Exhibit
110	Jeffrey Lenberg - Exhibit 3 -	Deposition Exhibit
	Logan Signal Messages	
446	2022.11.21 Deposition of	Deposition Exhibit
110	Jeffrey Lenberg - Exhibit 4 -	Beposition Exmot
	Harvey Memo on system	
	copies	
447	2022.11.21 Deposition of	Deposition Exhibit
	Jeffrey Lenberg - Exhibit 5 -	1
	Coffee County ICC & ICP	
	Reports	
448	2022.11.21 Deposition of	Deposition Exhibit
	Jeffrey Lenberg - Exhibit 6 -	
	Coffee County and Pierce	
	County Records Request	
449	2022.11.21 Deposition of	Deposition Exhibit
	Jeffrey Lenberg - Exhibit 7 -	
	Color photograph, Cellebrite	
	kit for copying	
450	2022.11.21 Deposition of	Deposition Exhibit
	Jeffrey Lenberg - Exhibit 8 -	
4 = 3	Measuring the desk message	D W Blile
451	2022.11.21 Deposition of	Deposition Exhibit
	Jeffrey Lenberg - Exhibit 9 -	
	Color photograph, Lenberg	
452	light ring	Donosition Exhibit
404	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 11 -	Deposition Exhibit
	Color photograph, pictures	
	coming	
453	2022.11.21 Deposition of	Deposition Exhibit
100	Jeffrey Lenberg - Exhibit 12 -	Doposition Dambit
	ICP - Analysis - Updated,	
	Dominion 5.5	
		<u>l</u>

Exhibit	Document Description	Document Type
454	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 13 - handwritten notes	Deposition Exhibit
455	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 14 - Thumb drive contents - CCBOE Docs responsive to subpoenas	Deposition Exhibit
456	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 15 - Ben Cotton Signal & Coffee County related emails	Deposition Exhibit
457	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 16 - Moncla Signal Communications Annotated	Deposition Exhibit
458	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 17 - Lenberg vote stealing attack	Deposition Exhibit
459	2019.07.24 Deposition of Lynn Ledford - Exhibit 1 - Notice of Deposition	Deposition Exhibit
460	2019.07.24 Deposition of Lynn Ledford - Exhibit 2 - Subpoena	Deposition Exhibit
461	2019.07.24 Deposition of Lynn Ledford - Exhibit 3 - E-mail from Ms. Black 6/21/19 regarding provisional ballots	Deposition Exhibit
462	2019.07.24 Deposition of Lynn Ledford - Exhibit 4 - Voter Comments and Concerns Forms	Deposition Exhibit
463	2019.07.24 Deposition of Lynn Ledford - Exhibit 5 - Intergovernmental agreement	Deposition Exhibit
464	2019.07.24 Deposition of Lynn Ledford - Exhibit 6 - Creating	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	and saving export File in GEMS	
465	2019.07.24 Deposition of Lynn Ledford - Exhibit 7 - OEB	Deposition Exhibit
466	2019.07.24 Deposition of Lynn Ledford - Exhibit 8 - Election Related files	Deposition Exhibit
467	2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018	Deposition Exhibit
468	2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County March 1, 2016	Deposition Exhibit
469	2019.07.24 Deposition of Lynn Ledford - Exhibit 11 - E-mail from Mr. Newby 8/23/16	Deposition Exhibit
470	2019.07.24 Deposition of Lynn Ledford - Exhibit 12 - Declaration	Deposition Exhibit
471	2019.07.24 Deposition of Lynn Ledford - Exhibit 13 - Declaration	Deposition Exhibit
472	2019.07.24 Deposition of Lynn Ledford - Exhibit 14 - Declaration	Deposition Exhibit
473	2019.07.24 Deposition of Lynn Ledford - Exhibit 15 - Election Results Report	Deposition Exhibit
474	2019.07.24 Deposition of Lynn Ledford - Exhibit 16 - Election Results Report	Deposition Exhibit
475	2019.07.24 Deposition of Lynn Ledford - Exhibit 17 - Gwinnett County Election Day Manager manual	Deposition Exhibit

Exhibit	Document Description	Document Type
No.		
476	2019.07.24 Deposition of Lynn	Deposition Exhibit
	Ledford - Exhibit 18 - OEB	
	January 30, 2019	
477	2019.07.24 Deposition of Lynn	Deposition Exhibit
	Ledford - Exhibit 19 - Ballot	
	Image Report	
478	2021.11.4 Deposition of Anh	Deposition Exhibit
	Le - Exhibit 1 - Minutes	
479	2022.08.08 Deposition of	Deposition Exhibit
	Cathleen Latham - Exhibit 1 -	
	Subpoena	
480	2022.08.08 Deposition of	Deposition Exhibit
	Cathleen Latham - Exhibit 2 -	
	Subpoena	
481	2022.08.08 Deposition of	Deposition Exhibit
	Cathleen Latham - Exhibit 3 -	
	Screenshot from Hampton	
	Video	
482	2022.08.08 Deposition of	Deposition Exhibit
	Cathleen Latham - Exhibit 4 -	
	Letter dated 12/23/20 re	
	Notice of Obligation to	
	preserve documents related to	
	dominion	7.11
483	2022.08.08 Deposition of	Deposition Exhibit
	Cathleen Latham - Exhibit 5 -	
	Draft executive order dated	
	12/16/20 from President	
404	Trump	D
484	2022.08.08 Deposition of	Deposition Exhibit
	Cathleen Latham - Exhibit 6 -	
	iPhone text message string	
105	screenshots	Denosition F-hibit
485	2022.08.23 Deposition of Janice Johnston - Exhibit 1 -	Deposition Exhibit
	Plaintiffs' Identification of	
	Outsdtanding Discovery	
	Disputes	

	Document Description	Document Type
No.	2022 20 20 D	D D 1.1.
486	2022.08.23 Deposition of	Deposition Exhibit
	Janice Johnston - Exhibit 2 -	
	Security Analysis of Georgia's	
405	ImageCast X BMDs	D ::: F 1:1::
487	2022.08.23 Deposition of	Deposition Exhibit
	Janice Johnston - Exhibit 3 -	
	Excerpt testimony from	
	Videotaped videoconference	
400	deposition of Juan Gilbert	D D 1.1.
488	2022.08.23 Deposition of	Deposition Exhibit
	Janice Johnston - Exhibit 4 -	
	Activity Alert: ICSA-22-XXX-	
	XX Vulnerabilities Affecting	
	Dominion Voting Systems	
400	ImageCast X	D ': E 1:1:
489	2022.08.23 Deposition of	Deposition Exhibit
	Janice Johnston - Exhibit 5 -	
400	Key Photos from production	D
490	2022.08.23 Deposition of	Deposition Exhibit
	Janice Johnston - Exhibit 6 -	
	People who have downloaded	
401	CC data	D
491	2022.08.23 Deposition of Janice Johnston - Exhibit 7 -	Deposition Exhibit
	Declaration of Benjamin R.	
492	Cotton	Denosition Exhibit
494	2022.08.23 Deposition of Janice Johnston - Exhibit 8 -	Deposition Exhibit
	May 7, 2021 Barnes' E-mail	
	chain re: Cyber Ninjas	
493	2022.08.23 Deposition of	Deposition Exhibit
490	Janice Johnston - Exhibit 9 -	Deposition Eximit
	Excerpt from the deposition of	
	James A. Barnes	
494	2022.08.23 Deposition of	Deposition Exhibit
404	Janice Johnston - Exhibit 10 -	Deposition Eximit
	E-mail string, Renewed	
	Letter Petition to State	
	Leviel I ention to State	

Exhibit No.	Document Description	Document Type
	Election Board, dated June 6, 2022, at 10:50 a.m.	
495	2022.07.20 Deposition of James Barnes, Jr Exhibit 1 - October 27, 2021 email chain	Deposition Exhibit
496	2022.07.20 Deposition of James Barnes, Jr Exhibit 2 - ICS Advisory, "Vulnerabilities Affecting Dominion Voting Systems ImageCast X	Deposition Exhibit
497	2022.07.20 Deposition of James Barnes, Jr Exhibit 3 - April/May 2021 email chain with attachment	Deposition Exhibit
498	2022.07.20 Deposition of James Barnes, Jr Exhibit 4 - April/May 2021 email chain	Deposition Exhibit
499	2022.07.20 Deposition of James Barnes, Jr Exhibit 5 - Photo of Post-it note	Deposition Exhibit
500	2022.07.20 Deposition of James Barnes, Jr Exhibit 6 - May 2021 email chain with attachment	Deposition Exhibit
501	2022.07.20 Deposition of James Barnes, Jr Exhibit 7 - Coffee County Board of Elections and Registration Monthly Board Meeting, April 13, 2021, 9:30 AM	Deposition Exhibit
502	2022.07.20 Deposition of James Barnes, Jr Exhibit 8 - Invoice dated 4/13/2021	Deposition Exhibit
503	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 4 -	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	State-Defendants-00113529 - 113530	
504	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 5 - State-Defendants-00108790 - 00108791	Deposition Exhibit
505	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 6 - State-Defendants-00110732- 00110734	Deposition Exhibit
506	2022.01.21 Deposition of Derrick Gilstrap - Exhibit 7 - E-mail string to Brower and others from Cummings, 10/22/2020 State-Defendants- 00169113 - 00169114	Deposition Exhibit
507	2023.01.03 Deposition of Alex Halderman - Exhibit 1 - 12- 20-22, State Defendants' Notice to Take the Second Expert Desposition of Alex Halderman	Deposition Exhibit
508	2023.01.03 Deposition of Alex Halderman - Exhibit 2 - Declaration of Alex Halderman Re: The Above- captioned action.	Deposition Exhibit
509	2021.10.21 Deposition of Juan Gilbert - Exhibit 1 - Declaration of Juan Gilbert	Deposition Exhibit
510	2021.10.21 Deposition of Juan Gilbert - Exhibit 2 - Document Entitled "Georgia Voter Verification Study"	Deposition Exhibit
511	2021.10.21 Deposition of Juan Gilbert - Exhibit 3 - United States Patent, No. US 11.036,442 B2	Deposition Exhibit

	Document Description	Document Type
No.		
512	2021.10.21 Deposition of Juan	Deposition Exhibit
	Gilbert - Exhibit 4 - Article	
	entitled "Why computer	
	scientists prefer paper	
	ballots"	
513	2021.10.21 Deposition of Juan	Deposition Exhibit
	Gilbert - Exhibit 5 -	
	Document labeled "Exhibit A"	
514	2021.10.21 Deposition of Juan	Deposition Exhibit
	Gilbert - Exhibit 6 - E-mail	
	string, top e-mail to Scott	
	Tucker from Michael Barnes	
515	2021.10.21 Deposition of Juan	Deposition Exhibit
	Gilbert - Exhibit 7 - Twitter	
	page	
516	2021.10.21 Deposition of Juan	Deposition Exhibit
	Gilbert - Exhibit 8 - Letter to	
	Juan E. Gilbert, Ph.D. from	
	Bryan P. Tyson, dated 11-8-19	
517	2021.10.21 Deposition of Juan	Deposition Exhibit
	Gilbert - Exhibit 9 - Trial	
	transcript, dated 3-24-09	
518	2021.11.05 Deposition of	Deposition Exhibit
	Sarah Ghazal - Exhibit 1 -	
	Tweet by Sara Ghazal, Dated	
	2/28/20	
519	2021.11.05 Deposition of	Deposition Exhibit
	Sarah Ghazal - Exhibit 2 -	
	email chain	
520	2021.11.05 Deposition of	Deposition Exhibit
	Sarah Ghazal - Exhibit 3 -	
	STATE-DEFENDANTS-	
	00201663 through -1664	
521	2021.11.05 Deposition of	Deposition Exhibit
	Sarah Ghazal - Exhibit 4 -	
	Tweet by Sara Ghazal, Dated	
	2/28/2020	

Exhibit No.	Document Description	Document Type
522	2021.11.05 Deposition of Sarah Ghazal - Exhibit 5 - Tweet by Sara Ghazal	Deposition Exhibit
523	2022.01.18 Deposition of David Hamilton - Exhibit 1 - Email Chain, FORTALICE001200 through - 001201	Deposition Exhibit
524	2022.01.18 Deposition of David Hamilton - Exhibit 2 - LinkedIn Profile of David Hamilton	Deposition Exhibit
525	2022.01.18 Deposition of David Hamilton - Exhibit 3 - Email Chain dated August 2016, Bates Numbers FORTALICE000002952 through -2953	Deposition Exhibit
526	2022.01.18 Deposition of David Hamilton - Exhibit 4 - Fortalice Red Team Penetration Test and Cyber Risk Assessment Report for State of Georgia, Office of the Secretary of State, November 2018, Bates Numbers Payton 000070 through -000119	Deposition Exhibit
527	2022.01.18 Deposition of David Hamilton - Exhibit 5 - Declaration of David Hamilton	Deposition Exhibit
528	2022.01.18 Deposition of David Hamilton - Exhibit 6 - Task order from Fortalice to the Secretary of State's office dated March 11, 2021, Bates Numbers	Deposition Exhibit

Exhibit No.	Document Description	Document Type
140.	FORTALICE000001 through - 2	
529	2022.01.18 Deposition of David Hamilton - Exhibit 7 - Weekly Updates from Fortalice to the Secretary of State's Office, Bates Numbers FORTALICE002781 through -2788	Deposition Exhibit
530	2022.01.18 Deposition of David Hamilton - Exhibit 8 - Email Chain, Bates Numbers STATE-DEFENDANTS- 00126678 through -126682	Deposition Exhibit
531	2022.01.18 Deposition of David Hamilton - Exhibit 9 - Email Chain, Bates Numbers STATE-DEFENDANTS- 00126696 through -126698	Deposition Exhibit
532	2022.01.18 Deposition of David Hamilton - Exhibit 10 - News Article, "UPDATE: Ransomware Attackers Hit Hall County Election Infrastructure, dated October 23, 2020	Deposition Exhibit
533	2022.01.18 Deposition of David Hamilton - Exhibit 11 - Email Chain, Bates Number STATE-DEFENDANTS- 00104972	Deposition Exhibit
534	2022.01.18 Deposition of David Hamilton - Exhibit 12 - Email Chain, Bates Numbers STATE-DEFENDANTS-	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	00158821 through -158822	
535	2022.01.18 Deposition of David Hamilton - Exhibit 13 - Election Office Notes, 10 AM 6/15/20 Meeting, Bates Numbers STATE- DEFENDANTS-00158823 through -158825	Deposition Exhibit
536	2022.01.18 Deposition of David Hamilton - Exhibit 14 - Email Chain, Bates Numbers STATE-DEFENDANTS- 00171971 through -171973	Deposition Exhibit
537	2022.01.18 Deposition of David Hamilton - Exhibit 15 - Email Chain, Bates Numbers FORTALICE001209 through -1212	Deposition Exhibit
538	2022.01.18 Deposition of David Hamilton - Exhibit 16 - Supplemental Declaration of David Hamilton	Deposition Exhibit
539	2022.01.18 Deposition of David Hamilton - Exhibit 17 - Email Chain, Bates Numbers STATE-DEFENDANTS- 00126614 through -126616	Deposition Exhibit
540	2022.01.18 Deposition of David Hamilton - Exhibit 18 - Email Chain, Bates Numbers FORTALICE001163 through FORTALICE001166	Deposition Exhibit

Exhibi	Document Description	Document Type
No.	2 ocument 2 escription	Document Type
541	2022.01.18 Deposition of	Deposition Exhibit
	David Hamilton - Exhibit 19 -	•
	Report from Fortalice	
	Solutions dated July 14,	
	2020, Bates Numbers	
	FORTALICE000625 through -	
	629	
542	2022.01.18 Deposition of	Deposition Exhibit
	David Hamilton - Exhibit 20 -	
	Email from David Hamilton	
	dated 4/29/2021, Bates	
	Number STATE-	
	DEFENDANTS-00170625	
543	2022.01.18 Deposition of	Deposition Exhibit
	David Hamilton - Exhibit 21 -	
	Email from Dave Hamilton	
	dated 8/21/2020, Bates	
	Number	
	STATE-DEFENDANTS-	
F 4 4	00161203	Descrition February
544	2022.01.18 Deposition of David Hamilton - Exhibit 22 -	Deposition Exhibit
	Document, Bates Numbers STATE-DEFENDANTS-	
	00161204.xl	
	sx through -161204.xlsx	
545	2022.01.18 Deposition of	Deposition Exhibit
	David Hamilton - Exhibit 23 -	Doposition Damoit
	Document Titled "2020	
	Security of the Voter	
	Registration System Artifacts	
	and Attestation	
	Pursuant to Rule 590-8-301"	
	dated December	
	18, 2020, Bates Numbers	
	STATE-DEFENDANTS-	
	00182171	
	through -00182214	

Exhibit No.	Document Description	Document Type
546	2022.01.18 Deposition of David Hamilton - Exhibit 24 - Email Chain, Bates Numbers STATE-DEFENDANTS- 00182118 through -182120	Deposition Exhibit
547	2022.11.11 Deposition of Misty Hampton - Exhibit 1 - Article, Secretary of State's Office Opens Investigation into Coffee County's Handling Recount	Deposition Exhibit
548	2022.11.11 Deposition of Misty Hampton - Exhibit 2 - Text string messages, Gary with Dominion	Deposition Exhibit
549	2022.11.11 Deposition of Misty Hampton - Exhibit 3 - String of text messages with Eric Chaney	Deposition Exhibit
550	2022.11.11 Deposition of Misty Hampton - Exhibit 4 - String of text messages between Misty Hampton and Eric Chaney	Deposition Exhibit
551	2022.11.11 Deposition of Misty Hampton - Exhibit 5 - Chart of "Confidential" text messages	Deposition Exhibit
552	2022.11.11 Deposition of Misty Hampton - Exhibit 6 - Messages - Andy Thomas & Ernestine Thomas-Clark and Eric Chaney and Matthew McC and Wendell Stone	Deposition Exhibit
553	2022.11.11 Deposition of Misty Hampton - Exhibit 7 - E-mail from Misty Hampton	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	to Open Records Request, dated March 31, 2021	
554	2022.11.11 Deposition of Misty Hampton - Exhibit 8 - Time sheet review	Deposition Exhibit
555	2022.11.11 Deposition of Misty Hampton - Exhibit 9 - Text messages from James Dom tech	Deposition Exhibit
556	2022.11.11 Deposition of Misty Hampton - Exhibit 10 - Misty video production - CCBOE responses to Plaintiffs subpoenas	Deposition Exhibit
557	2022.11.11 Deposition of Misty Hampton - Exhibit 11 - Lindell lands in Douglas	Deposition Exhibit
558	2022.11.11 Deposition of Misty Hampton - Exhibit 12 - Shawn Still Complaint	Deposition Exhibit
559	2022.11.11 Deposition of Misty Hampton - Exhibit 13 - Misty Hampton e-mailing Robert Sinners' Personal Email	Deposition Exhibit
560	2022.11.11 Deposition of Misty Hampton - Exhibit 14 - E-mail from Christina Read, Thursday, December 10, 2020	Deposition Exhibit
561	2022.11.11 Deposition of Misty Hampton - Exhibit 15 - Misty Hampton e-mails from other county users	Deposition Exhibit
562	2022.11.11 Deposition of Misty Hampton - Exhibit 16 - Photograph of password for 2020 Election	Deposition Exhibit

Exhibit No.	Document Description	Document Type
563	2022.11.11 Deposition of Misty Hampton - Exhibit 17 - Photograph, Miles Latham on January 7	Deposition Exhibit
564	2022.11.11 Deposition of Misty Hampton - Exhibit 18 - Photograph of young man walking to building	Deposition Exhibit
565	2022.11.11 Deposition of Misty Hampton - Exhibit 19 - Photograph, Alex Cruce, on January 7	Deposition Exhibit
566	2022.11.11 Deposition of Misty Hampton - Exhibit 20 - Photograph of Misty's office, GEMS room	Deposition Exhibit
567	2022.11.11 Deposition of Misty Hampton - Exhibit 21 - Series of photographs	Deposition Exhibit
568	2022.11.11 Deposition of Misty Hampton - Exhibit 22 - Still shots from DouglasNow YouTube video	Deposition Exhibit
569	2022.11.11 Deposition of Misty Hampton - Exhibit 23 - EMS computer password	Deposition Exhibit
570	2022.11.11 Deposition of Misty Hampton - Exhibit 24 - Photograph, Coffee County GEMS password	Deposition Exhibit
571	2022.11.11 Deposition of Misty Hampton - Exhibit 25 - Photograph, (exterior only) Lenberg - January 27, 28, 29	Deposition Exhibit
572	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 1 - 1- 26-22, Curling Plaintiffs' Second Amended Notice of Deposition	Deposition Exhibit

Exhibit No.	Document Description	Document Type
573	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 2 - LinkedIn profile re: Chris Harvey	Deposition Exhibit
574	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 3	Deposition Exhibit
575	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 4 - State Defendants 101460 thru 461, 11-6-20, E-mail string from Chris Harvey to Frances Watson re: Violation.	Deposition Exhibit
576	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 5 - State Defendants 101471 thru 473, 11-10-20, E-mail string from Chris Harvey to Frances Watson re: Security seals on B.M.D.s.	Deposition Exhibit
577	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 6 - State Defendants 108321, 10- 10-20, E-mail from David Worley to Chris Harvey re: Hall County.	Deposition Exhibit
578	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 7 - State Defendants 108787 thru 788, 5-28-20, E-mail string from Chris Harvey to George Gray re: Board of Elections.	Deposition Exhibit

	Document Description	Document Type
No.		
579	2022.01.28 30(b)(6) SOS	Deposition Exhibit
	(Chris Harvey) - Exhibit 8 -	
	State Defendants 110230 thru	
	231, 10-15-20, E-mail string	
	from Carol Heard to Chris	
	Harvey re: Threat	
	assessment.	D
580	2022.01.28 30(b)(6) SOS	Deposition Exhibit
	(Chris Harvey) - Exhibit 9 -	
	State Defendants 115480 thru	
	482, 10-30-19, E-mail string	
	from Deb Cox to Chris Harvey	
	re:	
	Encoding a supplemental	
X 04	voter.	D. W. D.L.
581	2022.01.28 30(b)(6) SOS	Deposition Exhibit
	(Chris Harvey) - Exhibit 10 -	
	State Defendants 117430 thru	
	431, 2-25-21, E-mail string	
	Chris Harvey from Jordan	
	Fuchs re: Security sensitive	
	FW: Call	
F 00	follow-up.	D
582	2022.01.28 30(b)(6) SOS	Deposition Exhibit
	(Chris Harvey) - Exhibit 11 -	
	State Defendants 139190 thru	
	192, 4-5-19, E-mail string	
	from Kovin Royburn to Jordan	
	Kevin Rayburn to Jordan Fuchs re: I bet I can hack	
	your	
599	electronic voting machines.	Danagitian Fyhihit
583	2022.01.28 30(b)(6) SOS (Chris Harroy) Exhibit 12	Deposition Exhibit
	(Chris Harvey) - Exhibit 12 -	
	Fortalice 1209 thru 1212, 11-	
	2-20, E-mail string from	
	Chris Furtick to Roy Iversen	
	re: Computer accessed	
	remotely.	

Exhibit	Document Description	Document Type
No.	Document Description	Document Type
584	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 13 - Dominion 69648, 9-25-20, Chris Harvey Post to The Buzz re: Very important announcement concerning databases.	Deposition Exhibit
585	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 14 - Dominion 72216, 10-19-20, E- mail from Scott Tucker to list re: GA advanced voting.	Deposition Exhibit
586	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 15 - Dominion 73354, 11-8-20, E- mail string from Kay Stimson to Jen Daulby re: Voting issue in Georgia.	Deposition Exhibit
587	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 16 - Dominion 74766 thru 769, 11- 17-20, E-mail string from Chris Harvey to Scott Tucker and David Greenwalt re: Update to firewall rules for Meraki MDM for poll pads, attached.	Deposition Exhibit
588	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 17 - Dominion 74784 thru 785, 11- 17-20, E-mail string from Scott Tucker to Chris Harvey re: memory cards	Deposition Exhibit

Exhibit	Document Description	Document Type
No.		
589	2022.01.28 30(b)(6) SOS	Deposition Exhibit
	(Chris Harvey) - Exhibit 18 -	
	Dominion 76086 thru 088, 1-	
	7-21, E-mail string from Tom	
	Feehan to Blake Evans and	
	Scott Tucker re:	
	We have a problem.	
590	2022.01.28 30(b)(6) SOS	Deposition Exhibit
	(Chris Harvey) - Exhibit 19 -	
	State Defendants 2000997	
	thru 201000, 7-16-19, E-mail	
	string	
	from Ryan Germany to Brad	
	Raffensperger, Jordan Fuchs	
	and	
	Merritt Beaver re: N.A.S.S.	
	elections committee	
	NormShield	
	press release/score card on	
	State Web site security.	
591	2022.01.28 30(b)(6) SOS	Deposition Exhibit
	(Chris Harvey) - Exhibit 20 -	
	State Defendants 165630 thru	
	632, 12-31-20, E-mail string	
	from Angelos Keromytis to	
	Jordan	
	Fuchs re: Election machine	
7 00	hack?	D ''
592	2022.01.28 30(b)(6) SOS	Deposition Exhibit
	(Chris Harvey) - CGG Exhibit	
	1 - O.C.G.A. Section 21-2-	
	379.22 re: Requirements for	
F 00	electronic ballot marking.	D '': E 1'':
593	2022.01.28 30(b)(6) SOS	Deposition Exhibit
	(Chris Harvey) - CGG Exhibit	
	4 - 10-12-20, Reuters color	
	photograph of presidential	
	elections early voting at State	
	Farm Arena.	

Exhibit	Document Description	Document Type
No.	Bocament Bescription	Document Type
594	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 12 - Secure the Vote PowerPoint re: Precinct Layout to Aid with Privacy Training.	Deposition Exhibit
595	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 14 - 12-1-20, State of Georgia Official Election Bulletin from Chris Harvey to County election officials and county registrars re: Preserving ballot images and delivering to Sec. of State.	Deposition Exhibit
596	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 16 - Rockdale 924, 6-11-20, E- mail from Cynthia Willingham to Scott Tucker, Chris Harvey and Kevin Rayburn re: Additional training needed - tech and regional manager.	Deposition Exhibit
597	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 1 - 6-30-22, Subpoena to Produce Documents, Information or Objects or to Permit Inspection of Premises in a Civil Action to Eric B. Chaney re: The above-captioned action.	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	•	<i>.</i> 1
598	2022.08.15 Coffee County	Deposition Exhibit
	30(b)(6) Deposition (Eric	
	Chaney) - Exhibit 2 - 8-5-22,	
	Subpoena to Produce	
	Documents, Information or	
	Objects or to Permit	
	Inspection of Premises in a	
	Civil Action to	
	Eric B. Chaney re: The above-	
	captioned action.	
599	2022.08.15 Coffee County	Deposition Exhibit
	30(b)(6) Deposition (Eric	
	Chaney) - Exhibit 3 - 8-14-22,	
	Chaney Response to CGG	
	Subpoena for Production of	
	Documents re: Curling v.	
	Kemp.	
600	2022.08.15 Coffee County	Deposition Exhibit
	30(b)(6) Deposition (Eric	
	Chaney) - Exhibit 4 - State	
	Defendants 202100 thru 103,	
	9-28-21, State of Georgia	
	Secretary of State,	
	Investigations Division	
	Summary re: Coffee County.	
601	2022.08.15 Coffee County	Deposition Exhibit
	30(b)(6) Deposition (Eric	
	Chaney) - Exhibit 5 - Color	
	photograph of	
	computer/keyboard with Post-	
	It note.	
602	2022.08.15 Coffee County	Deposition Exhibit
	30(b)(6) Deposition (Eric	
	Chaney) - Exhibit 6 - Latham	
	24 thru 53, Compilation	
	exhibit re: Coffee County	
	Board of Elections documents.	

Exhibit No.	Document Description	Document Type
603	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 7 - 10-6-20 thru 5-3-22, Coffee County Board of Elections and Registration Regular Monthly Meeting Minutes.	Deposition Exhibit
604	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 8 - 4-12-22, E-mail string from Jennifer Dorminey Herzog to Ryan Germany re: Response to 4- 12-22 Emma Brown Washington Post inquiry.	Deposition Exhibit
605	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 9 - 3-15-18 thru 3-1-21, text message string between Eric Chaney and Misty Hampton.	Deposition Exhibit
606	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 10 - 8122022-34 thru -53, 1-8-21, E-mail string from Paul Maggio to Sidney Powell re: Jim Penrose-Coffee County GA forensics engagement agreement.	Deposition Exhibit
607	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 11 - 6-3-22, ICS Advisory re: Vulnerabilities affecting Dominion Voting Systems ImageCast X.	Deposition Exhibit

Exhibit No.	Document Description	Document Type
608	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 12 - LinkedIn Web page print-out re: Robert A. Sinners.	Deposition Exhibit
609	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 13 - 12-12- 20, Verified Petition for Emergency Injunctive and Declaratory Relief re: Still v. Raffensperger.	Deposition Exhibit
610	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 1 - 8-25-22 Subpoena to Testify At A Deposition in a Civil Action, Coffee County Board of Elections & Registration	Deposition Exhibit
611	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 2 - 1-7-21 and 1-8-21 Three Screen Shots From Video of Two Men Entering Office Carrying/Pulling Items	Deposition Exhibit
612	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 3 - Screen Shots from Camera 1 1-7-21	Deposition Exhibit
613	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 4 - E-mail Chain Ending with Tuesday, May 11, 2021 3:30 PM E-mail, from Watson, to Jones, Subject: Fwd: Coffee County	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	•	
614	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 5 - 5-6-21 Dominion Voting, Customer Notification: Maintaining Secure Chain of Custody for Your Dominion Voting System, CONFIDENTIAL, STATE- DEFENDANTS-00101937	Deposition Exhibit
615	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 6 - A Series of Photographs Showing Compact Flash Cards with Handwritten Tags, Flash Drives, Etc., 08122022-000236-265	Deposition Exhibit
616	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 7 - Screen Shots from Camera 1 on 1-27-21 Through 1-29-21	Deposition Exhibit
617	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 8 - 1-28-21 and 1-29-21 Screen Shots of Individuals Entering and Leaving the Elections Office	Deposition Exhibit
618	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 9 - Two Photographs of Jeffrey Lenberg	Deposition Exhibit

Evhibit	Document Description	Document Type
No.	Document Description	Document Type
619	2022.09.01 Coffee County	Deposition Exhibit
010	30(b)(6) Depsition (Wendell	Deposition Exiliate
	Stone) - Plaintiff's Exhibit 10	
	- Composite Exhibit of Coffee	
	County Board of Elections	
	and Registration Board	
	Meeting Minutes Beginning	
	with 10-6-20	
620	2022.09.01 Coffee County	Deposition Exhibit
	30(b)(6) Depsition (Wendell	-
	Stone) - Plaintiff's Exhibit 11	
	- 8/12/22 12:20 PM (GMT-	
	05:00) E-mail, from Chaney,	
	to Thomas-Clark, et al.,	
	Subject: Coffee Co Board of	
	Elections	
621	2022.09.01 Coffee County	Deposition Exhibit
	30(b)(6) Depsition (Wendell	
	Stone) - Plaintiff's Exhibit 12	
	- Typewritten Sheet	
	Beginning: 3.4.22 (3) All	
	documents, including	
	communications; E-mail	
	Chain Ending with Tuesday,	
	4-12-20 3:50 PM E-mail, from	
	Herzog, to Germany, Subject:	
	FW: Response to 4/12/22	
	Emma Brown Washington	
622	Post inquiry 2022.09.01 Coffee County	Deposition Exhibit
022	30(b)(6) Depsition (Wendell	Deposition Eximple
	Stone) - Plaintiff's Exhibit 13	
	- Photograph of Voyles and	
	Eric Chaney Sitting at a	
	Table with Laptop in	
	Elections Office	

Exhibit	Document Description	Document Type
623	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 14 - Messages - Eric Chaney (With Hampton) Beginning 3/15/18 7:40 PM	Deposition Exhibit
624	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 15 - Messages - Andy Thomas & Ernestine Thomas-Clark & Eric Chaney & Matthew McC & Wendell Stone, Beginning with 1-4-12 7:21 PM Text	Deposition Exhibit
625	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 16 - 2-25-21 Resignation Letter, from Ridlehoover, to Board of Elections Chairperson	Deposition Exhibit
626	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 17 - 2-25-21 Resignation Letter, from Hampton, to Board of Elections Chairperson	Deposition Exhibit
627	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 18 - Juha, Keskinen (@MacFinn44), TWITTER (Feb. 26, 2021, 6:05 PM) Twitter Post	Deposition Exhibit
628	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 19 - Text Message Between Hampton and Rowell	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	(Withdrawn to Attorney- Client Privilege)	
629	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 20 - Message # 249 - From Vickers, to Hampton, Subject: FW [EXTERNAL]Re: Open Records Request	Deposition Exhibit
630	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 21 - Summary, Dyanna Hours Claimed Period 11-16-20 - 2- 19-21	Deposition Exhibit
631	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 22 - Screen Shots from Camera 1 1-8-21 Man Leaving with Equipment	Deposition Exhibit
632	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 23 - E-mail Chain Ending with Thursday, 7-15-21 1:57 PM E- mail, from Hampton, to Vickers, Subject: Re: Open Records Request	Deposition Exhibit
633	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 24 - 4-12-22 Letter, to Marks, from Herzog, Consolidation of Outstanding Open Records Requests	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	_ 0001110110 _ 00021p01011	_ 00111101110
634	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 25 - 1-8-21 3:48:30 PM E-mail, from Maggio, to Powell, Subject: RE: SSA1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement, 08122022-000034 - 53	Deposition Exhibit
635	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 26 - 11-30-20 SullivanStrickler Engagement Agreement Forensic Analysis, 08122022- 000110 - 122	Deposition Exhibit
636	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 27 - SSA1722 HARD DRIVE CONTENTS	Deposition Exhibit
637	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 28 - Spreadsheet of E-mail Addresses with Access to Coffee County Data, 08122022-000126-136	Deposition Exhibit
638	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 29 - Spreadsheet of IP Addresses That Have Downloaded Coffee County Data, 08122022- 000137-161	Deposition Exhibit

Exhibit	Document Description	Document Type
No.	Bocament Bescription	Boddine Type
639	2022.09.01 Coffee County	Deposition Exhibit
	30(b)(6) Depsition (Wendell	
	Stone) - Plaintiff's Exhibit 30	
	- CISA - ICS Advisory (ICSA-	
	22-154-01) Vulnerabilities	
	Affecting Dominion Voting	
	Systems ImageCast X	
640	2022.09.01 Coffee County	Deposition Exhibit
	30(b)(6) Depsition (Wendell	
	Stone) - Plaintiff's Exhibit 31	
	- 12-17-20 Still v.	
	Raffensperger Lawsuit,	
	Verified Petition for	
	Emergency Injunctive and	
641	Declaratory Relief 2022.09.01 Coffee County	Deposition Exhibit
041	30(b)(6) Depsition (Wendell	Deposition Exhibit
	Stone) - Defendants' Exhibit 1	
	- Ga Comp. R. & Regs. 183-1-	
	1204, 183-1-1204. Storage,	
	Maintenance, and Transport	
	of Statewide Voting System	
	Components	
642	2022.09.01 Coffee County	Deposition Exhibit
	30(b)(6) Depsition (Wendell	-
	Stone) - Defendants' Exhibit 2	
	- 1-7-21 Screen Shots of Men	
	Entering Front Door of	
	Elections Office with	
	Equipment	
643	2022.09.01 Coffee County	Deposition Exhibit
	30(b)(6) Depsition (Wendell	
	Stone) - Defendants' Exhibit 3	
	- E-mail Chain Ending with	
	Friday, May 7, 2021 1:51:10	
	PM E-mail, from Germany, to	
	Feehan, et al., Subject: RE:	
	[EXTERNAL] RE: Dominion	
	notice to Customers re: Chain	

Exhibit No.	Document Description	Document Type
	of Custody, Ending Dominion 089394	
644	9.29.2021 Deposition of Ricardo Davis - Exhibit 1 - Notice of Deposition	Deposition Exhibit
645	9.29.2021 Deposition of Ricardo Davis - Exhibit 2 - Declaration Filed 10/23/19	Deposition Exhibit
646	9.29.2021 Deposition of Ricardo Davis - Exhibit 3 - Mr. Davis voting record	Deposition Exhibit
647	9.23.2021 Deposition of Laura Digges - Exhibit 1 - Notice of Deposition	Deposition Exhibit
648	9.23.2021 Deposition of Laura Digges - Exhibit 2 - CBS46 News article	Deposition Exhibit
649	9.23.2021 Deposition of Laura Digges - Exhibit 3 - CGG's and Coalition's Objections and Responses to Raffensperger's First Req. for Admissions	Deposition Exhibit
650	9.23.2021 Deposition of Laura Digges - Exhibit 4 - ENET Report	Deposition Exhibit
651	9.23.2021 Deposition of William Digges III - Exhibit 1 - Notice of Deposition	Deposition Exhibit
652	9.23.2021 Deposition of William Digges III - Exhibit 2 - ENET Report	Deposition Exhibit
653	9.23.2021 Deposition of William Digges III - Exhibit 3	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	- Coalition Statement on William Diggs	
654	9.23.2021 Deposition of William Digges III - Exhibit 4 -Declaration of William Diggs, III dated October 20, 2019	Deposition Exhibit
655	9.23.2021 Deposition ofWilliam Digges III - Exhibit 5- Bullet Point Sheet	Deposition Exhibit
656	6.28.2019 Deposition of Jennifer Doran - Exhibit 32 - Subpoena	Deposition Exhibit
657	6.28.2019 Deposition of Jennifer Doran - Exhibit 33 - Direct Record Electronic Voting Machine Recap	Deposition Exhibit
658	6.28.2019 Deposition of Jennifer Doran - Exhibit 34 - Ballot Image Report	Deposition Exhibit
659	6.28.2019 Deposition of Jennifer Doran - Exhibit 35 - Official Election Bulletin	Deposition Exhibit
660	6.28.2019 Deposition of Jennifer Doran - Exhibit 36 - 11.26.2018 General Election Undervote Information	Deposition Exhibit
661	6.28.2019 Deposition of Jennifer Doran - Exhibit 37 - Rockdale County Board of Election Voting Equipment Issues	Deposition Exhibit
662	9.22.2022 Deposition of Dean Felicetti - Exhibit 1 - Subpoena to Testify at a Civil Action	Deposition Exhibit
663	9.22.2022 Deposition of Dean Felicetti - Exhibit 2 - Picture of Jim Nelson, Senior System	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Engineer at Sullivan Strickler LLC	
664	9.22.2022 Deposition of Dean Felicetti - Exhibit 3 - Picture of Jennifer Jackson, Senior System Enngineer at Sullivan Strickler LLC	Deposition Exhibit
665	9.22.2022 Deposition of Dean Felicetti - Exhibit 4 - Picture of Karuna Naik, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit
666	9.22.2022 Deposition of Dean Felicetti - Exhibit 5 - Picture of Paul Maggio, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit
667	9.22.2022 Deposition of Dean Felicetti - Exhibit 6 - Engagement Agreement, November 30, 2020	Deposition Exhibit
668	9.22.2022 Deposition of Dean Felicetti - Exhibit 7 - Engagement Agreement, MI AZ, December 6, 2020	Deposition Exhibit
669	9.22.2022 Deposition of Dean Felicetti - Exhibit 8 - January 8, 2021 Maggio email chain invoice	Deposition Exhibit
670	9.22.2022 Deposition of Dean Felicetti - Exhibit 9 - Phone text message, 8.12.2022	Deposition Exhibit
671	9.22.2022 Deposition of Dean Felicetti - Exhibit 10 - Coffee County Board of Educations and Registration Elections	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	Office Security Video, 1.7.2021	
672	9.22.2022 Deposition of Dean Felicetti - Exhibit 11 - January 8, 2021 From 5pm to 6pm missing video	Deposition Exhibit
673	9.22.2022 Deposition of Dean Felicetti - Exhibit 12 - Bates Numbers 08122022 to 265	Deposition Exhibit
674	9.22.2022 Deposition of Dean Felicetti - Exhibit 13 - Password Memos, 08122022 - 000123 through 125	Deposition Exhibit
675	9.22.2022 Deposition of Dean Felicetti - Exhibit 14 - Maggio hard drive contents (screenshots)	Deposition Exhibit
676	9.22.2022 Deposition of Dean Felicetti - Exhibit 15 - 8.17.2022 Maggio Production (Triage reports) Folder Structure	Deposition Exhibit
677	9.22.2022 Deposition of Dean Felicetti - Exhibit 16 - Bates No.s 08122022-000126 through 136	Deposition Exhibit
678	9.22.2022 Deposition of Dean Felicetti - Exhibit 17 - Bates No.s 08122022-000137 through 161	Deposition Exhibit
679	9.22.2022 Deposition of Dean Felicetti - Exhibit 18 - Bates No.s 08122022-000175 through 176	Deposition Exhibit
680	9.22.2022 Deposition of Dean Felicetti - Exhibit 19 - Bates	Deposition Exhibit

Exhibit No.	Document Description	Document Type
	No.s 08122022-000098 through 105	
681	9.22.2022 Deposition of Dean Felicetti - Exhibit 20 - Bates No.s 08122022-000204 through 205	Deposition Exhibit
682	9.22.2022 Deposition of Dean Felicetti - Exhibit 21 - Bates No.s 08122022-000205.XLSX	Deposition Exhibit
683	9.22.2022 Deposition of Dean Felicetti - Exhibit 22 - Bates No.s 08122022-000022 through 33	Deposition Exhibit
684	9.22.2022 Deposition of Dean Felicetti - Exhibit 23 - Maggio-000057 58 Excel	Deposition Exhibit
685	9.22.2022 Deposition of Dean Felicetti - Exhibit 24 May 7, 2021 Barnes e-mail chain re: Cyber Ninjas	Deposition Exhibit
686	9.22.2022 Deposition of Dean Felicetti - Exhibit 25 - Subpoena	Deposition Exhibit
687	9.22.2022 Deposition of Dean Felicetti - Exhibit 26 State Defendants-001 01937	Deposition Exhibit
688	9.22.2022 Deposition of Dean Felicetti - Exhibit 27 - ICS Advisory (ICSA-22-154-01) Vulnerabilities Affecting Dominion Voting Systems ImageCast X	Deposition Exhibit
689	9.22.2022 Deposition of Dean Felicetti - Exhibit 28 Copy of Check to Defendant the Republic	Deposition Exhibit
690	2022.11.22 Deposition of Alex Cruce - Exhibit 1 - Subpoena	

Exhibit	Document Description	Document Type
No.		
691	2022.11.22 Deposition of Alex	
	Cruce - Exhibit 2 - Email with	
	Slogs from Misty Hampton,	
	dated January 7, 2021	
692	2022.11.22 Deposition of Alex	
	Cruce - Exhibit 3 - Color	
	photographs	
693	2022.11.22 Deposition of Alex	
	Cruce - Exhibit 4 - Binnall	
	Maggio Engagement Letter	
694	2022.11.22 Deposition of Alex	
	Cruce - Exhibit 5 -	
	Washington Post Inquiry	
695	2022.11.22 Deposition of Alex	
	Cruce - Exhibit 6 - Recording	
	Trancript	
696	2022.11.22 Deposition of Alex	
	Cruce - Exhibit 7 - OCR	
	Additional Documents	
697	2022.01.19 Deposition of	
	Donna Curling - Exhibit 1 -	
	Amended Notice of Deposition	
698	2022.01.19 Deposition of	
	Donna Curling - Exhibit 3 -	
	Declaration of Donna Curling	
	in Support of Curling	
	Plaintiffs' Motion for	
	Preliminary Injunction	
699	2022.01.19 Deposition of	
	Donna Curling - Exhibit 7 -	
	Verified Complaint for	
	Declaratory Relief, Injunctive	
	Relief, and Writ of Mandamus	
700	2022.01.19 Deposition of	
	Donna Curling - Exhibit 8 -	
	Third Amended Complaint	
701	2022.01.19 Deposition of	
	Donna Curling - Exhibit 9 -	

Evhibit	Document Description	Document Type
No.	Document Description	Document Type
110.	Email Chain (CURLING-	
	0006817 - 0006818)	
702	2022.01.19 Deposition of	
	Donna Curling - Exhibit 10 -	
	Email Chain (CURLING-	
	0010237 - 0010239)	
703	2022.01.19 Deposition of	
	Donna Curling - Exhibit 11 -	
	Email chain (CURLING-	
	0010015 - 0010023)	
704	2022.01.19 Deposition of	
	Donna Curling - Exhibit 12 -	
	Email chain (CURLING-	
	0010166 - 0010180)	
705	2022.01.19 Deposition of	
	Donna Curling - Exhibit 14 -	
	Curling Plaintiffs'Responses	
	and Objections to Ahn Le's	
	First	
	Interrogatories to Donna	
	Curling, Donna Price, and	
= 0.0	Jeffrey Schoenberg	
706	2022.01.19 Deposition of	
	Donna Curling - Exhibit 15 -	
	Curling Plaintiffs' Responses	
	to Defendant Brad	
	Raffensperger's First	
707	Requests For Admission	
707	2022.01.19 Deposition of	
	Donna Curling - Exhibit 16 -	
	Declaration of Donna P.	
	Curling in Support of Motion	
700	for Preliminary Injunction	
708	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit 1 - Linked In Profile of Ben	
	Cotton	

Exhibit	Document Description	Document Type
No.	Bocament Bescription	Bocament Type
709	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	2 - Letter from Andrew	
	Parker to Mary Kaiser, and	
	others, dated 8.24.2022	
710	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	3 - Letter from Andrew	
	Parker to Mary Kaiser dated	
	8.19.2022	
711	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	4 - Article entitled: Pro-	
	Trump Tech Team Copied	
	Georgia Election Data,	
	Records Show	
712	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	5 - 1.8.2021 Paul Maggio	
	email chain and invoice	
713	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	6 - Key Photos from Maggio	
= 1.4	Production	
714	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	7 - 8.12.2022 Maggio Hard	
715	Drive Contents	
715	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit 8 - 8.12.2022 Email addresses	
	with access to CC data	
716	8.25.2022 Deposition of	
110	Benjamin R. Cotton - Exhibit	
	9 - 4.22.2021 Email, Greg	
	Freemyer - no involvement	
	Treeminer - no minornement	

Exhibit	Document Description	Document Type
No.		
717	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	10 - Email chain, Coffee	
	County Forensics FedEx to	
	Lambert	
718	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	11 - Cotton Excerpt, 7.21.2022	
	Motion Hearing, Lake v.	
	Hobbs	
719	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	12 - Declaration of Benjamin	
	R, Cotton in Lake v. Hobbs	
720	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	13 - 5.7.2021 Barnes email	
5 01	chain re: Cyber Ninjas	
721	8.25.2022 Deposition of	
	Benjamin R. Cotton - Exhibit	
	14 - Georgia, Secretatary of	
	State, News and	
722	Announcements, 1.27.2022	
122	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit	
	15 - ICS Advisory (ICSA-22-	
	154-01) 6.4.22, 3:21 p.m.	
723	8.25.2022 Deposition of	
120	Benjamin R. Cotton - Exhibit	
	16 - 7.13.2021 Corrected	
	Exhibit B - 7.12 Declaration	
	of J. Alex Halderman	
724	8.25.2022 Deposition of	
1	Benjamin R. Cotton - Exhibit	
	D1 - Exhibit D to Cotton First	
	Declaration - EAC Inv Report	
	Williamson County, TN	

Exhibit No.	Document Description	Document Type
725	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit D2 - Exhibit F to Cotton's First Declaration - Halderman Dec. 2020.08.19	
726	8.25.2022 Deposition of Benjamin R. Cotton - Exhibit D3 - Exhibit G to Cotton First Declaration - Halderman Rebuttal Declaration	
727	State Defendants' Statement of Undisputed Material Facts Exhibit 1 - AJC Article: High- Tech Voting Due November	State Defendants' Statement of Unidsputed Material Facts
728	State Defendants' Statement of Undisputed Material Facts Exhibit 2 - The National Academies Press: Securing the Vote Protecting American Democracy	State Defendants' Statement of Unidsputed Material Facts
729	State Defendants' Statement of Undisputed Material Facts Exhibit 3 - Declaration of Ryan Germany	State Defendants' Statement of Unidsputed Material Facts
730	State Defendants' Statement of Undisputed Material Facts Exhibit 4 - Declaration of Dr. Eric Coomer	State Defendants' Statement of Unidsputed Material Facts
731	State Defendants' Statement of Undisputed Material Facts Exhibit 5 - Declaration of Dr. Juan Gilbert	State Defendants' Statement of Unidsputed Material Facts
732	State Defendants' Statement of Undisputed Material Facts Exhibit 6 - SOS DRE De- certification Order	State Defendants' Statement of Unidsputed Material Facts
733	State Defendants' Statement of Undisputed Material Facts	State Defendants' Statement of Unidsputed Material Facts

Exhibit	Document Description	Document Type
	Exhibit 7 - Coalition Pltfs Motion to Sever	
734	State Defendants' Statement of Undisputed Material Facts Exhibit 8 - Coalition Pltfs Motion to Sever Brief ISO	State Defendants' Statement of Unidsputed Material Facts
735	State Defendants' Statement of Undisputed Material Facts Exhibit 9 - Curling Pltfs Notice of Joinder in Coalition's Motion to Sever	State Defendants' Statement of Unidsputed Material Facts
736	State Defendants' Statement of Undisputed Material Facts Exhibit 10 - Curling Pltfs Reply in Support of Motion to Sever	State Defendants' Statement of Unidsputed Material Facts
737	State Defendants' Statement of Undisputed Material Facts Exhibit 11 - Hearing Transcript for 11/19/21	State Defendants' Statement of Unidsputed Material Facts
738	State Defendants' Statement of Undisputed Material Facts Exhibit 12 - Declaration of Mark Riccobono	State Defendants' Statement of Unidsputed Material Facts
739	State Defendants' Statement of Undisputed Material Facts Exhibit 13 - Deposition Transcript of Teresa Lynn Ledford	State Defendants' Statement of Unidsputed Material Facts
740	State Defendants' Statement of Undisputed Material Facts Exhibit 14 - Hearing Transcript for 7/26/19	State Defendants' Statement of Unidsputed Material Facts
741	State Defendants' Statement of Undisputed Material Facts Exhibit 15 - Declaration of Chris Harvey	State Defendants' Statement of Unidsputed Material Facts

Exhibit No.	Document Description	Document Type
742	State Defendants' Statement of Undisputed Material Facts Exhibit 16 - Deposition Transcript of Donna Curling (1/19/22)	State Defendants' Statement of Unidsputed Material Facts
743	State Defendants' Statement of Undisputed Material Facts Exhibit 17 - Curling Amended Complaint	State Defendants' Statement of Unidsputed Material Facts
744	State Defendants' Statement of Undisputed Material Facts Exhibit 18 - Donna Curling ENET Report	State Defendants' Statement of Unidsputed Material Facts
745	State Defendants' Statement of Undisputed Material Facts Exhibit 19 - Donna Curling email from 10/20/20	State Defendants' Statement of Unidsputed Material Facts
746	State Defendants' Statement of Undisputed Material Facts Exhibit 20 - Deposition Transcript of Donna Price (3/8/22)	State Defendants' Statement of Unidsputed Material Facts
747	State Defendants' Statement of Undisputed Material Facts Exhibit 21 - Donna Price ENET Report	State Defendants' Statement of Unidsputed Material Facts
748	State Defendants' Statement of Undisputed Material Facts Exhibit 22 - Deposition Transcript of Jeffrey Schoenberg (10/19/21)	State Defendants' Statement of Unidsputed Material Facts
749	State Defendants' Statement of Undisputed Material Facts Exhibit 23 - Jeffrey Schoenberg ENET Report	State Defendants' Statement of Unidsputed Material Facts
750	State Defendants' Statement of Undisputed Material Facts Exhibit 24 - Jeffrey	State Defendants' Statement of Unidsputed Material Facts

Evhihi	Document Description	Dogument Type
No.	Document Description	Document Type
110.	Schoenberg Absentee ENET Report	
751	State Defendants' Statement of Undisputed Material Facts Exhibit 25 - CGG 30(b)(6) Deposition Transcript	State Defendants' Statement of Unidsputed Material Facts
752	State Defendants' Statement of Undisputed Material Facts Exhibit 26 - Coalition Third Amended Complaint	State Defendants' Statement of Unidsputed Material Facts
753	State Defendants' Statement of Undisputed Material Facts Exhibit 27 - Coalition Brief in Support of Motion for PI	State Defendants' Statement of Unidsputed Material Facts
754	State Defendants' Statement of Undisputed Material Facts Exhibit 28 - Deposition Transcript of Laura Digges	State Defendants' Statement of Unidsputed Material Facts
755	State Defendants' Statement of Undisputed Material Facts Exhibit 29 - Laura Digges ENET Report	State Defendants' Statement of Unidsputed Material Facts
756	State Defendants' Statement of Undisputed Material Facts Exhibit 30 - Deposition Transcript of William Digges III	State Defendants' Statement of Unidsputed Material Facts
757	StateDefendants' Statement of Undisputed Material Facts Exhibit 31 - Coalition Pltfs Statement on William Digges	State Defendants' Statement of Unidsputed Material Facts
758	StateDefendants' Statement of Undisputed Material Facts Exhibit 32 - William Digges III ENET Report	State Defendants' Statement of Unidsputed Material Facts

Evhibit	Document Description	Document Type
No.	Document Description	Document Type
759	State Defendants' Statement	State Defendants' Statement of
	of Undisputed Material Facts	Unidsputed Material Facts
	Exhibit 33 - Deposition	
	Transcript of Ricardo Davis	
760	State Defendants' Statement	State Defendants' Statement of
	of Undisputed Material Facts	Unidsputed Material Facts
	Exhibit 34 - Ricardo Davis	
501	ENET Report	
761	State Defendants' Statement	State Defendants' Statement of
	of Undisputed Material Facts	Unidsputed Material Facts
	Exhibit 35 - Deposition Transarint of Mogan Missett	
762	Transcript of Megan Missett State Defendants' Statement	State Defendants' Statement of
102	of Undisputed Material Facts	Unidsputed Material Facts
	Exhibit 36 - Megan Missett	Chaspatea Material Lacts
	ENET Report	
763	State Defendants' Statement	State Defendants' Statement of
	of Undisputed Material Facts	Unidsputed Material Facts
	Exhibit 37 - The Georgia	
	Risk-Limiting Audit/Hand	
	Tally: A Carter Center	
	Observation Report	
764	State Defendants' Statement	State Defendants' Statement of
	of Undisputed Material Facts	Unidsputed Material Facts
	Exhibit 38 - The Carter	
	Center Preliminary Statement on Georgia's	
	Statement on Georgia's November 2022 Risk-Limiting	
	Audit Process	
765	State Defendants' Statement	State Defendants' Statement of
	of Undisputed Material Facts	Unidsputed Material Facts
	Exhibit 39 - SOS Risk-	•
	Limiting Audit Report	
766	State Defendants' Statement	State Defendants' Statement of
	of Undisputed Material Facts	Unidsputed Material Facts
	Exhibit 40 - Curling Plaintiffs'	
	Responses to Defendant Brad	
	Raffensperge's First RFA	

Exhibit No.	Document Description	Document Type
767	State Defendants' Statement of Undisputed Material Facts Exhibit 41 - MITRE Report	State Defendants' Statement of Unidsputed Material Facts
768	State Defendants' Statement of Undisputed Material Facts Exhibit 42 - Declaration of Phillip Stark (3/9/22)	State Defendants' Statement of Unidsputed Material Facts
769	State Defendants' Statement of Undisputed Material Facts Exhibit 43 - Phillip Stark Resignation Letter	State Defendants' Statement of Unidsputed Material Facts
770	State Defendants' Statement of Undisputed Material Facts Exhibit 44 - Declaration of Phillip Stark (12/5/22)	State Defendants' Statement of Unidsputed Material Facts
771	State Defendants' Statement of Undisputed Material Facts Exhibit 45 - Deposition Transcript of Dr. Phillip Stark	State Defendants' Statement of Unidsputed Material Facts
772	State Defendants' Statement of Undisputed Material Facts Exhibit 46 - CURLING- 0010015-0010023	State Defendants' Statement of Unidsputed Material Facts
773	State Defendants' Statement of Undisputed Material Facts Exhibit 47 - CURLING- 0010127-0010135	State Defendants' Statement of Unidsputed Material Facts
774	State Defendants' Statement of Undisputed Material Facts Exhibit 48 - CURLING- 0010142-0010152	State Defendants' Statement of Unidsputed Material Facts
775	State Defendants' Statement of Undisputed Material Facts Exhibit 49 - CURLING- 0010153-0010165	State Defendants' Statement of Unidsputed Material Facts
776	State Defendants' Statement of Undisputed Material Facts	State Defendants' Statement of Unidsputed Material Facts

Exhibit No.	Document Description	Document Type
	Exhibit 50 - CURLING- 0010166-0010180	
777	State Defendants' Statement of Undisputed Material Facts Exhibit 51 - CURLING- 0010181-0010184	State Defendants' Statement of Unidsputed Material Facts
778	State Defendants' Statement of Undisputed Material Facts Exhibit 52 - Auditing Indian Elections Article	State Defendants' Statement of Unidsputed Material Facts
779	State Defendants' Statement of Undisputed Material Facts Exhibit 53 - PI Hearing Transcript (9/10/20)	State Defendants' Statement of Unidsputed Material Facts
780	State Defendants' Statement of Undisputed Material Facts Exhibit 54 - Securing the Vote: Protecting American Democracy	State Defendants' Statement of Unidsputed Material Facts
781	State Defendants' Statement of Undisputed Material Facts Exhibit 55 - Third Supplemental Declaration of Philip Stark	State Defendants' Statement of Unidsputed Material Facts
782	State Defendants' Statement of Undisputed Material Facts Exhibit 56 - Deposition Transcript of Kevin Skoglund	State Defendants' Statement of Unidsputed Material Facts
783	State Defendants' Statement of Undisputed Material Facts Exhibit 57 - Deposition Transcript of Dr. Halderman (11/17/21)	State Defendants' Statement of Unidsputed Material Facts
784	State Defendants' Statement of Undisputed Material Facts Exhibit 58 - Deposition Transcript of Dr. Halderman (1/3/23)	State Defendants' Statement of Unidsputed Material Facts

Exhibit No.	Document Description	Document Type
785	State Defendants' Statement of Undisputed Material Facts Exhibit 59 - Expert Report of Dr. Andrew Appel	State Defendants' Statement of Unidsputed Material Facts
786	State Defendants' Statement of Undisputed Material Facts Exhibit 60 - Deposition Transcript of Dr. Andrew Appel	State Defendants' Statement of Unidsputed Material Facts
787	Declaration of J. Alex Halderman In Support of Motion for Preliminary Injunction (Aug. 8, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 1
788	Declaration of Richard A. DeMillo (Sept. 9, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 3
789	Declaration of J. Alex Halderman (Sept. 1, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 4
790	Transcript of Michael Ian Shamos, Ph.D., J.D. depo (July 19, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 5
791	Black Box Voting - Diebold TSx Evaluation, Security Alert (May 11, 2006)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 6
792	Declaration of Duncan A. Buell (Aug. 7, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 7
793	Paper: Security Analysis of the Diebold AccuVote-TS Voting Machine (Sept. 13, 2006)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 8
794	Meeting Minutes on Electronic Voting System Security - House of Representatives Committee	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 9

Exhibit	Document Description	Document Type
No.		
	on House Administration (July 7, 2004)	
795	Transcript of Michael Barnes depo (June 27, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 10
796	Declaration of Michael Barnes (July 10, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 11
797	Powerpoint from Kennesaw State University Center for Election Systems on The Georgia Voting System (Feb. 2014)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 12
798	Order - Denying Plfs' Motions for Preliminary Injunction (Sept. 17, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 13
799	Declaration of Logan Lamb (Aug. 3, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 14
800	Affidavit of Logan Lamb (June 30, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 15
801	News Article from Kennesaw State University regarding the Center for Election Systems (Mar. 21, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 16
	Emails with KSU individuals	
802	Email chain between Merle Steven King and Michael Barnes RE: Re: Follow Up from earlier email regarding security of	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 17

Exhibit No.	Document Description	Document Type
	elections.kennesaw.edu (Aug. 29, 2016)	
803	Supplemental Declaration of Logan Lamb (Jan. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 18
804	Email chain between Michael Barnes and Stephen Craig Gay RE: Request for data retrieval (Mar. 17, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 19
805	Email confirmation of delivery to State Election Board, sent from Scott Holcomb to Curling Plfs (July 6, 2016)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 20
806	Email chain between Christopher Dehner and Davide Gaetano RE: CES Network Assessment Meeting Notes 6/26 (July 19, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 21
807	Email chain between Christopher Dehner and Stephen Gay Re: CES server surplus (Aug. 9, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 23
808	News Article from AP News re: Georgia election server wiped after suit filed (Oct. 26, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 25
809	TRANSCRIPT OF EVIDENTIARY HEARING PROCEEDINGS (Sept. 12, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 26

Exhibit	Document Description	Document Type
No.	•	V 1
810	DECLARATION OF J. ALEX HALDERMAN IN SUPPORT OF CURLING PLAINTIFFS' RESPONSE TO STATE DEFENDANTS' REQUEST FOR STATUS CONFERENCE AND NOTICE OF DECERTIFICATION OF GEMS/DRE SYSTEM AND CURLING PLAINTIFFS' REQUEST FOR HEARING (Jan. 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 27
811	Instructions on Creating and Saving Export File in GEMS - Transferring Files from FireZilla for Election Day by Kennesaw State University Center for Election Systems	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 28
812	TRANSCRIPT OF EVIDENTIARY HEARING PROCEEDINGS (July 25, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 29
813	Transcript of James Oliver depo (Jan. 17, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 30
814	Transcript of Sanford Merritt Beaver as Secretary of State 30(b)(6) and in personal capacity depo (Feb. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 31
815	Declaration of Chris Harvey (Aug. 25, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 35
816	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION (Sept. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 36

Exhibit	Document Description	Document Type
No.		
817	Cloudburst Security - Office of	Plaintiffs' Exhibits in Support of
	the Georgia Secretary of State	Opposition to Defendants' Motions
	FINAL Vendor Cyber Risk	for Summary Judgment Exhibit 37
	Assessment (Feb. 2018)	
818	Cloudburst Security - Office of	Plaintiffs' Exhibits in Support of
	the Georgia Secretary of State	Opposition to Defendants' Motions
	Cyber Risk Assessment (Oct.	for Summary Judgment Exhibit 38
	2017)	
819	Fortalice Solutions Technical	Plaintiffs' Exhibits in Support of
	Assessment Prepared for	Opposition to Defendants' Motions
	Secretary of State Georgia	for Summary Judgment Exhibit 39
	DRAFT (Aug. 25, 2020)	
820	Email chain between Josh	Plaintiffs' Exhibits in Support of
	Hood and Ted Koval RE:	Opposition to Defendants' Motions
	Fannin County IP (April 3,	for Summary Judgment Exhibit 40
001	2019)	DI :
821	Email chain between Dave	Plaintiffs' Exhibits in Support of
	Hamilton and Kimberly	Opposition to Defendants' Motions
	Lemley Re: [External]: Fwd:	for Summary Judgment Exhibit 41
	Potential leakage of voter	
822	data (Aug. 13, 2020) Email chain between Dave	Disintiffed Enhibits in Company of
844	Hamilton and Merritt Beaver	Plaintiffs' Exhibits in Support of
	Re: The 590 Rule Attestation	Opposition to Defendants' Motions for Summary Judgment Exhibit 42
	(Dec. 21, 2020)	lor Summary Sudgment Exhibit 42
823	TRANSCRIPT OF HEARING	Plaintiffs' Exhibits in Support of
020	ON PRELIMINARY	Opposition to Defendants' Motions
	INJUNCTION	for Summary Judgment Exhibit 44
	PROCEEDINGS (July 26,	101 Summary o dagment Emilion 11
	2019)	
824	,	Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration of Eric. D.	for Summary Judgment Exhibit 45
005	Coomer (Nov. 13, 2019)	
825	STATE DEFENDANTS'	Plaintiffs' Exhibits in Support of
	RESPONSE TO COURT'S	Opposition to Defendants' Motions
	QUESTIONS ON NEW	for Summary Judgment Exhibit 46
	ELECTION SYSTEM	

Exhibit No.	Document Description	Document Type
	VENDOR CONTRACT (July	
	30, 2019)	
826		Plaintiffs' Exhibits in Support of
	M	Opposition to Defendants' Motions
	Transcript of Gabriel Sterling depo (Feb. 24, 2022)	for Summary Judgment Exhibit 48
827	Secretary of State 2020	Plaintiffs' Exhibits in Support of
	Security of the Voter	Opposition to Defendants' Motions
	Registration System	for Summary Judgment Exhibit 49
	Artifacts and Attestation	
	Pursuant to Rule 590-8-301	
	(Dec. 18, 2020)	
828	Order - State Defendants'	Plaintiffs' Exhibits in Support of
	Motion to Dismiss Curling	Opposition to Defendants' Motions
	Plaintiffs' Third Amended	for Summary Judgment Exhibit 51
	Complaint and Coalition	
	Plaintiffs' First Supplemental	
	Complaint (July 20, 2020)	

Exhibit No.	Document Description	Document Type
829	Bulletin State Election Board RE: GEMS Servers and Security (Sept. 12, 2016)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 52
	Bulletin State Election Board RE: Suspected Russian Operative Activity (July 26, 2018)	
	Bulletin State Election Board RE: Two Factor Authentication Security for ENET (July 30, 2018)	
	Bulletin State Election Board RE: Physical Security Assessments Offered by Dept. of Homeland Security (Aug. 9, 2018)	
	Bulletin State Election Board RE: Phishing Attempt (Aug 17, 2018)	
	U.S. Dept. of Homeland Security Note re: U//F0U0 Cybersecurity - Elections, Unattributed Network Activity - Unattributed Cyber Actors Attempt to Gain Acces to City Government Network Prior to Primary Election Voting (Oct. 3, 2018)	
	U.S. Dept. of Homeland Security Note re: U//F0U0 Cybersecurity - Elections, Unattributed Network Acticity - Unattributed Actors	

Exhibit No.	Document Description	Document Type
NO.	Spoof Senior State Election Official's Email, Spear Phish City Clerk (Oct. 4, 2018) Memo re: Election Security Information Needs: Foreign Threats to U.S. Elections (Sept. 5, 2018) U.S. Dept. of Homeland Security Note re: (U) A Georgia Perspective on Threats to the 2018 U.S. Elections (Oct. 2, 2018)	
830	Email chain between Chris Harvey and Ryan Germany RE: FW: 2020 Rule 590-8-3 Attestation and Assessment v 3.2 (Dec. 30, 2020) atttachment Voter Registraton Certificate.pdf	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 53
831	Declaration of J. Alex Halderman (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 54

	Document Description	Document Type
No.		
832	Transcript of J. Alex Halderman depo (Nov. 17, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 55
833	Transcript of Andrew W. Appel depo (Jan. 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 56
834	Declaration of J. Alex Halderman (Oct. 2, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 57
835	Email chain between Cathi Smothers and Election Center RE: Muscogee Help Please RE: [EXTERNAL] RE: Database Corrections (April 2, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 58
836	Declaration of Elizabeth Throop (Mar. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 59
837	Email chain between Chris Harvey and Blake Evans (Nov. 13, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 60
838	Email chain between Nick Salsman and Dave Hamilto RE:	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 61
839	Election Office Notes: 10am 6/15/20 Meeting - Basic Overview most data provided by Michael Barnes. Nick and Terrence in attendance.	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 62
840	Transcript of Derrick Gilstrap Fulton County Board of Registration and Elections 30(b)(6) depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 63

Exhibit No.	Document Description	Document Type
841	Email chain between Michael Barnes and Scott Tucker RE: L&A Export to State (Jan. 15, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 64
842	Email chain between Kevin Rayburn and Veronica Johnson RE: ENR L&A Test Upload (June 2, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 65
843	Email chain between Chris Futrick and Paul Brandau RE: ElectioNet code / credentials posted publicly (Oct. 17, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 66
844	Transcript of James A. Barnes Jr. depo (July 20, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 67
845	Email chain between Dave Hamilton and Michael Smith RE: DataLocker Follow Up (July 1, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 68
846	Transcript of David Hamilton depo (Jan. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 69
847	Transcript of Richard Barron depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 70
848	Transcript of Juan Gilbert Ph.D. depo (Oct. 29, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 71
849	Screenshot of Youtube video: DouglasNow.com, Dominion Voting Machine Flaws – 2020 Election Coffee County, Georgia Video 1, YouTube (Dec. 9, 2020),	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 72

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No.	Document Description	Document Type
110.	https://www.youtube.com/wat ch?v=46CAKyyObls&t=16s	
850	Photo of computer serial number and note: SOS_Georgia and Votes!	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 73
851	Photo of note on computer	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 74
852	Declaration of J. Alex Halderman (Nov. 22, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 75
853	Secretary of State Investigation report RE: Coffee County - Miscellaneous - SEB2020-250 (Sept. 28, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 76
854	Transcript of interview of Brad Raffensperger re: U.S. House of Representatives Select Committee to Investigate the January 6th Attack on the U.S. Capitol (Nov. 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 77
855	Rev.com article "Georgia Secretary of State Brad Raffensperger Press Conference Transcript: Announces Hand Recount" (Nov. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 78

Exhibit No.	Document Description	Document Type
856	Secure, Accessible & Fair Elections (SAFE) Commission Report - Submitted to the General Assembly (Jan. 10, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 79
857	Joint Discovery Statement Regarding Production of FBI Server Image (Aug. 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 80
858		
859	Secretary of State press release "Security-Focused Tech Company, Dominion Voting to Implement new Verified Paper Ballot System" (July 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 82
860	STATE DEFENDANTS' SUPPLEMENTAL NOTICE REGARDING NEW ELECTION SYSTEM VENDOR CONTRACT (Aug. 9, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 83
861	Master Solution Purchase and Services Agreement between Dominion Voting Systems and Secretary of State of the State of Georgia (July 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 84
862	Transcript of Chris Harvey as Secretary of State 30(b)(6) (Jan. 28, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 85
863	Screenshot of Tweet from Gabriel Sterling with responses from David Cross and Marilyn Marks (Oct. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 86
864	TRANSCRIPT OF HEARING ON PRELIMINARY	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 87

Exhibit No.	Document Description	Document Type
	INJUNCTION (Sept. 10, 2020)	
865	Declaration of J. Alex Halderman (Aug. 2, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 88
866	Declaration (Eighth) of Philip B. Stark (Aug. 2, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 89
867	Declaration (Second Supplemental) of Philip B. Stark (Oct. 22, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 90
868	Paper "Addendum to Basic Security Requirements for Voting Systems" by Wenke Lee, Ph.D. (Jan. 3, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 92
869	REBUTTAL REPORT OF ANDREW W. APPEL (July 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 93
870	"What Voters are Asked to Verify Affects Ballot Verification: A Quantitative Analysis of Voters' Memories of their Ballots" - By Richard A. DeMillo and Robert S. Kadel (Georgia Institute of Technology) and Marilyn R. Marks (Coalition for Good Governance) (Nov. 23, 2018) (Revised April 11, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 94
871	Georgia Voter Verification Study by The University of Georgia Political Science School of Public and International Affairs (Jan. 22. 2021) draft version	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 95

Exhibit	Document Description	Document Type
No.	Doddinent Description	Document Type
872	Letter from professors to	Plaintiffs' Exhibits in Support of
	Secretary Crittenden,	Opposition to Defendants' Motions
	Secretary Raffensperger, and	for Summary Judgment Exhibit 96
	SAFE Commission Members	
0.50	(Jan. 7, 2019)	DI : .:00 + D 1:1:
873		Plaintiffs' Exhibits in Support of
	Declaration of J. Alex	Opposition to Defendants' Motions
	Halderman (Dec. 16, 2019)	for Summary Judgment Exhibit 97
874	Email chain between Marilyn	Plaintiffs' Exhibits in Support of
	Marks and Richard Barron	Opposition to Defendants' Motions
	RE: More on Athens (June 12,	for Summary Judgment Exhibit 98
	2020)	
875	COALITION PLAINTIFFS'	Plaintiffs' Exhibits in Support of
	EXPERT DISCLOSURES –	Opposition to Defendants' Motions
	OPENING REPORTS (July 1,	for Summary Judgment Exhibit 99
876	2021)	Plaintiffs' Exhibits in Support of
010		Opposition to Defendants' Motions
	Screenshot of Tweet thread	for Summary Judgment Exhibit
	from Ben Adida (Oct. 1, 2022)	100
877	. (,	Plaintiffs' Exhibits in Support of
	Screenshot of Tweet thread	Opposition to Defendants' Motions
	from Jeanne Dufort and Ben	for Summary Judgment Exhibit
	Adida (Feb. 19, 2020)	101
878		Plaintiffs' Exhibits in Support of
	Screenshot of Verified Voting	Opposition to Defendants' Motions
	map of Election Day	for Summary Judgment Exhibit
070	Equipment - November 2022	102
879		Plaintiffs' Exhibits in Support of
	Declaration of Warran	Opposition to Defendants' Motions
	Declaration of Warren Stewart (Dec. 16, 2019)	for Summary Judgment Exhibit 103
880	Written Testimony of Verified	Plaintiffs' Exhibits in Support of
	Voting.org - Marian K.	Opposition to Defendants' Motions
	Schneider, President (June 5,	for Summary Judgment Exhibit
	2019)	104
	/	<u> </u>

Exhibit No.	Document Description	Document Type
881	Transcript of Michael Barnes depo (Feb. 11, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 105
882	Email chain between Chris Harvey and Ryan Germany RE: Election Certification (June 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 106
883	Email chain between Blake Evans and Andrew Jackson RE: 3 images (Mar. 1, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 107
884	Letter from Governor Brian Kemp to the State Election Board members (Nov. 17, 2021) Memo "Review of Inconsistencies in the Data Supporting the Risk Limiting Audit Report" (Nov. 17, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 108
885	Email chain between Kay Stimson and Jen Daulby RE: Voting issue in Georgia (Nov. 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 109
886	US Patent - Transparent Interactive Printing Interface (June 15, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 110
887	Email chain between Chris Harvey and Frances Watson RE: FULTON COUNTY - MACHINES DOWN AND POLLING PLACES NOT OPEN (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 111

Exhibit No.	Document Description	Document Type
888	Email chain between Julie Houk and Ryan Germany RE: Election Protection hotline receiving reports of voting machine/poll pad issues in Floyd, Chatham, Fulton and Gwinnett Counties (Aug. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 112
889	Email chain between Ryan Germany and Frances Watson and Chris Harvey RE: Polling Machine Issues (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 113
890	Email chain between Chris Harvey and Richard Barron and Joseph Evans RE: Complaint - Down Machines (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 114
891	Email chain between Chris Harvey and Gabriel Sterling, Frances Watson, and Tom Feehan RE: Cross Keys High School- Dekalb (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 115
892	Email chain between Kevin Rayburn and Scott Tucker, Ryan Germany, Tom Feehan, and Cathi Smothers RE: continuing ENR issues (June 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 116
893	Email chain between Chris Harvey and Joseph Evans RE: South Atlanta High School Polling Location machines not working (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 117
894	Email chain between Gabriel Sterling and Tom Feehan, Chris Harvey RE: voter- 6	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 118

Exhibit No.	Document Description	Document Type
	hour wait and not voted yet (June 9, 2020)	
895	Email chain between Chris Harvey and Erica Hamilton RE: MACHINES NOT WORKING, NO PAPER BALLOTS AVAIL (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 119
896	Email chain between Leigh Combs and Chris Harvey RE: Turning people away (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 120
897	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION (Sept. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 121
898	STATE DEFENDANTS' OBJECTIONS AND RESPONSES TO CURLING PLAINTIFFS' FIRST SET OF INTERROGATORIES (July 15, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 122
899	STATE DEFENDANTS' RESPONSES AND OBJECTIONS TO CURLING PLAINTIFFS' SECOND SET OF INTERROGATORIES (Aug. 23, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 123
900	TRANSCRIPT OF TELEPHONE CONFERENCE PROCEEDINGS (Oct. 7, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 125
901	Response to Revised Interrogatories 15, 16, 19, 20, 21, 25, 26	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 126

Exhibit No.	Document Description	Document Type
902	Email chain between Frances	Plaintiffs' Exhibits in Support of
	Watson and Pamela Jones	Opposition to Defendants' Motions
	RE: Fwd: Coffee County (May	for Summary Judgment Exhibit
	11, 2021)	127
903		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Transcript of Anh Le depo	for Summary Judgment Exhibit
	(Nov. 4, 2021)	128
904		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Transcript of Mathew	for Summary Judgment Exhibit
	Mashburn depo (Nov. 4, 2021)	129
905	m	Plaintiffs' Exhibits in Support of
	Transcript of Rebecca Nash	Opposition to Defendants' Motions
	Sullivan, Esq. depo (Nov. 5,	for Summary Judgment Exhibit
000	2021)	130
906		Plaintiffs' Exhibits in Support of
	Dealementing of I Alem	Opposition to Defendants' Motions
	Declaration of J. Alex	for Summary Judgment Exhibit 131
907	Halderman (Feb. 12, 2021)	
907		Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions
	Photos of Video of pollpads,	for Summary Judgment Exhibit
	scanning, receipt	133
908	scanning, receipt	Plaintiffs' Exhibits in Support of
000	Photo of Acceptance Sheet of	Opposition to Defendants' Motions
	General Election Ballot (July	for Summary Judgment Exhibit
	1, 2020)	134
909	, -=-,	Plaintiffs' Exhibits in Support of
	Photo of pollpad receipt re:	Opposition to Defendants' Motions
	Sunday Liquor Sales total	for Summary Judgment Exhibit
	votes	135
910		Plaintiffs' Exhibits in Support of
	Dominion "2.02 Democracy	Opposition to Defendants' Motions
	Suite System Overview" (Nov.	for Summary Judgment Exhibit
	26, 2019)	136

Evhibit	Document Description	Document Type
No.	Document Description	Document Type
911	Transcript of APC Raffensperger 21022, Speakers Brad Raffensperger, Mark Niesse, and Nicole Carr (Feb. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 137
912	Transcript of Sanford Merritt Beaver as Secretary of State 30(b)(6) depo (Mar. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 138
913	Secretary of State press release "Secretary Raffensperger Calls on J. Alex Halderman to Agree to Release "Secret Report" and Pre-Election Testimony" (Jan. 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 139
914	Transcript of Janice W. Johnston M.D. (Aug. 23, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 140
915	Transcript of Sara Tindall Ghazal (Nov. 5, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 141
916	Transcript of Edward H. Lindsey Jr. (Aug. 31, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 142
917	Statement of Interest RE: Vulnerability Disclosure Issues in Curling v. Raffensperger, No. 17-cv-2989 (N.D. Ga.) from Brandon Wales CISA to Brian Boynton Acting Assistant Attorney General (Jan. 20, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 143

Exhibit	Document Description	Document Type
No.		
918	Notice from CISA "in response to matters raised at the Court's February 2, 2022 hearing regarding CISA's Coordinated Vulnerability Disclosure (CVD) process." (Feb. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 144
919	Status Report from CISA "on the final steps of CISA's Coordinated Vulnerability Disclosure process." (May 19, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 145
920	CISA ICS Advisory (ICSA-22- 154-01) - Vulnerabilities Affecting Dominion Voting Systems ImageCast X (June 3, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 146
921	Status Report from CISA "to update the Court and the parties on CISA's ongoing Coordinated Vulnerability Disclosure (CVD) process." (Mar. 14, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 147
922	Status Report from CISA "to update the Court and the parties on CISA's ongoing Coordinated Vulnerability Disclosure (CVD) process." (Apr. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 148
923	Transcript of Gabriel Sterling as Secretary of State 30(b)(6) depo (Oct. 12, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 149
924	Transcript of Wendell Stone as Coffee County Board of Elections & Registration 30(b)(6) depo (Sept. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 150

	Document Description	Document Type
No.		
925		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Transcript of Eric B. Chaney	for Summary Judgment Exhibit
	30(b)(6) depo (Aug. 15, 2022)	151
926	Paper "Basic Security	Plaintiffs' Exhibits in Support of
	Requirements for Voting	Opposition to Defendants' Motions
	Systems" by Wenke Lee,	for Summary Judgment Exhibit
	Ph.D. (Oct. 8, 2018)	152
927		Plaintiffs' Exhibits in Support of
	Declaration of J. Alex	Opposition to Defendants' Motions
	Halderman in Coomer v.	for Summary Judgment Exhibit
	Trump (Aug. 31, 2021)	153
928	Fortalice Solutions Technical	Plaintiffs' Exhibits in Support of
	Assessment Prepared for	Opposition to Defendants' Motions
	Secretary of State Georgia	for Summary Judgment Exhibit
	(Apr. 9, 2021)	154
929	Fortalice Red Team	Plaintiffs' Exhibits in Support of
	Penetration Test and Cyber	Opposition to Defendants' Motions
	Risk Assessment, State of	for Summary Judgment Exhibit
	Georgia, Office of the	155
	Secretary of State - November	
	2018	
930	Fortalice Solutions Web	Plaintiffs' Exhibits in Support of
	Vulneability Remediation	Opposition to Defendants' Motions
	Checks, Secretary of State	for Summary Judgment Exhibit
	Georgia DRAFT (July 14,	156
	2020)	
931	Fortalice Solutions Technical	Plaintiffs' Exhibits in Support of
	Assessment Prepared for	Opposition to Defendants' Motions
	Secretary of State Georgia	for Summary Judgment Exhibit
	DRAFT (May 19, 2020)	157
932	Fortalice Solutions Firmware	Plaintiffs' Exhibits in Support of
	Comparison and	Opposition to Defendants' Motions
	Configuration Analysis,	for Summary Judgment Exhibit
	Secretary of State Georgia	158
	DRAFT (July 9, 2020)	

Fyhihii	Document Description	Document Type
No.	Document Description	Document Type
933	Email chain between Meghan Aubry and Adam Sparks RE: Curling, et al. v. Raffensperger, et. al subpoena - Fortalice initial production in response to subpoena (July 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 159
934	Email chain between Chris Harvey and Frances Watson RE: SOS complaint in Fulton (Nov. 6, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 160
935	Powerpoint re: Fulton County SEB2020-027 Election Day Issues	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 161
936	Email chain between Chris Harvey and Frances Watson RE: photographs taken in poll in Hart County (Nov. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 162
937	Email chain between Chris Harvey and Samantha Sheldon RE: Jefferson County Board of Elections (Feb. 26, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 163
938	Email chain between Michael Barnes and Clinch County Elections RE: Data Seals (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 164
939	SOS Request for Changes "RFC_Election Center Data Center" (Aug. 16, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 165
940	Transcript of Dominic Olomo depo (Sept. 4, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 166

	Document Description	Document Type
No.	m :	D1: 4:66 1 E 1:1:4 : G 4 6
941	Transcript of Dominic Olomo	Plaintiffs' Exhibits in Support of
	30(b)(6) Fulton County Board	Opposition to Defendants' Motions
	of Registration and Elections	for Summary Judgment Exhibit
0.40	depo (Jan. 21, 2022)	167
942	Email chain between Dwight	Plaintiffs' Exhibits in Support of
	Brower and Richard Barron,	Opposition to Defendants' Motions
	Derrick Gilstrap and Timothy	for Summary Judgment Exhibit
	Cummings RE: Concerns over	168
	handling of Early voting	
0.40	ballots (Nov. 20, 2020)	
943	Notice on the Continuation of	Plaintiffs' Exhibits in Support of
	the National Emergency With	Opposition to Defendants' Motions
	Respect to Foreign	for Summary Judgment Exhibit
	Interference In or	169
	Undermining Public	
	Confidence in United States	
0.4.4	Elections (Sept. 7, 2022)	District Control of
944		Plaintiffs' Exhibits in Support of
	Email chain between Merritt	Opposition to Defendants' Motions
	Beaver and Klint Walker RE:	for Summary Judgment Exhibit
0.45	DHS (Nov. 12, 2020)	170
945	Email chain between Kevin	Plaintiffs' Exhibits in Support of
	Rayburn and Jordan Fuchs	Opposition to Defendants' Motions
	RE: I bet I can hack your	for Summary Judgment Exhibit
	electronic voting machines.	171
0.40	(Apr. 5, 2019)	D1: 4:66 + E1 1:1:4 : G
946	Comment	Plaintiffs' Exhibits in Support of
	Screenshot of text message	Opposition to Defendants' Motions
	thread from Eric Chaney	for Summary Judgment Exhibit
0.45	(March 2018 - March 2021)	District F. L. Living Connection
947		Plaintiffs' Exhibits in Support of
	The area control of NATA A	Opposition to Defendants' Motions
	Transcript of Misty Hampton	for Summary Judgment Exhibit
0.40	depo (Nov. 11, 2022)	Distriction Entitle in Comment of
948		Plaintiffs' Exhibits in Support of
	Comment	Opposition to Defendants' Motions
	Screenshot of text message	for Summary Judgment Exhibit
	thread to Eric and Cathy	174

Exhibit	Document Description	Document Type
No.		
949		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Transcript of Dean M.	for Summary Judgment Exhibit
	Felicetti depo (Sept. 2, 2022)	175
950	Screenshots re: "Coffee	Plaintiffs' Exhibits in Support of
	County Board of Elections	Opposition to Defendants' Motions
	and Registration Elections	for Summary Judgment Exhibit
	Office Security Video January	176
	7, 2021"	
951		Plaintiffs' Exhibits in Support of
	Screenshots re: "January 8,	Opposition to Defendants' Motions
	2021 From 5pm to 6pm	for Summary Judgment Exhibit
	missing video"	177
952	Email chain between Paul	Plaintiffs' Exhibits in Support of
	Maggio and Sidney Powell	Opposition to Defendants' Motions
	RE: 55A1722: Jim Penrose -	for Summary Judgment Exhibit
	Coffee County GA Forensics	178
	Engagement Agreement (Jan.	
050	8, 2021)	District Cold February Construction
953		Plaintiffs' Exhibits in Support of
	SEALED - Coffee County	Opposition to Defendants' Motions for Summary Judgment Exhibit
	server activity spreadsheet	179
954	server activity spreausileet	Plaintiffs' Exhibits in Support of
<i>J</i> J4		Opposition to Defendants' Motions
	Transcript of Kevin Skoglund	for Summary Judgment Exhibit
	depo (Dec. 16, 2022)	181
955	(200, 20, 202)	Plaintiffs' Exhibits in Support of
	Screenshots of Coffee County	Opposition to Defendants' Motions
	video footage of Jeffrey	for Summary Judgment Exhibit
	Lenberg (Jan. 27, 2021)	182
956	Screenshots of Coffee County	Plaintiffs' Exhibits in Support of
	video footage of Doug Logan	Opposition to Defendants' Motions
	and Jeffrey Lenberg (Jan. 18	for Summary Judgment Exhibit
	and 19, 2021)	183
957		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Transcript of Jeffrey Lenberg	for Summary Judgment Exhibit
	depo (Nov. 21, 2022)	184

	Document Description	Document Type
No.		District District Control
958		Plaintiffs' Exhibits in Support of
	"C 40 C . TGG 0 TGD	Opposition to Defendants' Motions
	"Coffee County ICC & ICP	for Summary Judgment Exhibit
	Reports"	185
959	Email chain between Misty	Plaintiffs' Exhibits in Support of
	Hampton and Tracie Vickers	Opposition to Defendants' Motions
	RE: Open Records Request	for Summary Judgment Exhibit
	(Feb. 4, 2021)	186
960		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration of J. Alex	for Summary Judgment Exhibit
	Halderman (Jan. 7, 2023)	187
961	Email chain between Bruce	Plaintiffs' Exhibits in Support of
	Brown and Defendants'	Opposition to Defendants' Motions
	Counsel RE: JSON Format	for Summary Judgment Exhibit
	Cast Vote Records on the	188
	Internet (July 27, 2022)	
962	Screenshot of Tweet from	Plaintiffs' Exhibits in Support of
	Juha Keskinen RE:	Opposition to Defendants' Motions
	"Dominion Voting Systems	for Summary Judgment Exhibit
	sues 'MyPillow Guy' for \$1.3	189
	billion" (Feb. 26, 2021)	
963	Letter from Jil Ridlehoover to	Plaintiffs' Exhibits in Support of
	Board of Elections Chair re	Opposition to Defendants' Motions
	her resignation from Coffee	for Summary Judgment Exhibit
	County (Feb. 25, 2021)	190
964	Letter from Misty Hampton to	Plaintiffs' Exhibits in Support of
301	Board of Elections Chair re	Opposition to Defendants' Motions
	her resignation from Coffee	for Summary Judgment Exhibit
	County (Feb. 25, 2021)	191
965	(100, 100, 100)	Plaintiffs' Exhibits in Support of
300	Screenshot of text message	Opposition to Defendants' Motions
	thread to Misty Hampton	for Summary Judgment Exhibit
	(Feb. 21, 2021)	192
966	(100, 21, 2021)	Plaintiffs' Exhibits in Support of
500		Opposition to Defendants' Motions
	Transcript of Jil Ridlehoover	for Summary Judgment Exhibit
	depo (Aug. 16, 2022)	193
	uepo (Aug. 10, 2022)	100

Exhibit No.	Document Description	Document Type
967	Fortalice Solutions Incident Response, Evidence Collection Process - Windows Operating Systems (Feb. 26, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 194
968	Secretary of State press release "Raffensperger to Replace Coffee County Election Equipment, End Distraction for Local Election Officials" (Sept. 23, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 195
969	Doc. 1377-4 - Hash Verification	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 197
970	Email chain between Bryan Tyson and all counsel RE: Secretary Raffensperger's Channel 11 Interview (Sept. 26, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 200
971	Declaration of James Persinger (Nov. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 201
972	Email chain between Bryan Tyson and Russ Abney and Caroline Middleton RE: Supplemental discovery obligations—Coffee County investigation files (Jan. 16, 2023)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 202
973	Letter from Steven Ellis Deputy General Counsel to GBI Director Vic Reynolds Re: Request for Assistance in Investigation (Aug. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 203
974	Email chain between Ryan Germany and Frances Watson and Chris Harvey RE:	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 205

Exhibit No.	Document Description	Document Type
	Polling Machine Issues (June 9, 2020)	
975	Email chain between Ryan Germany, Bryan Tyson, Carey Miller, and Vincent Russo RE: FW: GASOS ORR #22-360 from The Associated Press (Aug. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 206
976	Email chain between Sara Koth and Steven Ellis RE:FW: Open Records Request (July 12, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 207
977	Email chain between Steven Ellis and Anthony Rowell, Ryan Germany RE: Coffee County SEB investigation (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 208
978	Screenshots of Coffee County video footage (Dec. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 209
979	Screenshots of Coffee County video footage (Dec. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 210
980	Transcript of Robert A. Sinners depo (Sept. 28, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 211
981	Email chain between Harry MacDougald and Robert Sinners RE: Data File Needed for Vote Swapping/Switching (Nov. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 212

	Document Description	Document Type
No.		
982	LABELED Exhibit 215 [doc no. 1635-42] Dominion Voting press release "Customer Notification: Maintaining Secure Chain of Custody for Your Dominion Voting System" (May 6, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 213
983	Photo of note on computer (same as exhibit 74)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 214
984	Email chain between Frances Watson and Pamela Jones RE: Fwd: Coffee County (May 11, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 215
985	Article from 11Alive "Questions raised in timeline of state response to Coffee County breach" (Sept. 26, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 216
986	Screenshot of video "The Carter Center, Restoring Confidence in American Elections Panel 3 -April 29, 2022, YouTube (May 9, 2022)" of Gabriel Sterling with quote "So we are still dealing with that here and we still have to prove negatives in all these cases. It's similar across the board. But like, we had claims even recently there was people saying: 'We went to Coffee County. We imaged everything.' There's no evidence of any of that. It didn't happen."	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 217

Evhibit	Document Description	Document Type
No.	Document Description	Bocument Type
987		Plaintiffs' Exhibits in Support of
	Sharepoint Listing	Opposition to Defendants' Motions
	Investigations for Coffee	for Summary Judgment Exhibit
	County	218
988		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration (Seventh) Philip	for Summary Judgment Exhibit
	B. Stark (Sept. 13, 2020)	219
989		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Transcript of Philip Stark	for Summary Judgment Exhibit
	depo (Dec. 16, 2022)	220
990		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration Philip B. Stark	for Summary Judgment Exhibit
001	(Jan. 11, 2020)	221
991		Plaintiffs' Exhibits in Support of
	D1 (E'1.11) . (Dl. 11)	Opposition to Defendants' Motions
	Declaration (Eighth) of Philip	for Summary Judgment Exhibit
992	B. Stark (Aug. 2, 2021) Declaration of Andrew W.	Districted Exhibits in Current of
992		Plaintiffs' Exhibits in Support of
	Appel In Support of Motion for Preliminary Injunction	Opposition to Defendants' Motions for Summary Judgment Exhibit
	(Dec. 13, 2019)	223
993	(Dec. 19, 2013)	Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration (Fifth) of Philip	for Summary Judgment Exhibit
	B. Stark (Aug. 23, 2020)	224
994	(0 1 7	Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration Philip B. Stark	for Summary Judgment Exhibit
	(filed Sept. 11, 2018)	225
995		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration of Donna A.	for Summary Judgment Exhibit
	Curling (Aug. 7, 2018)	226

Exhibit No.	Document Description	Document Type
996	Declaration of Donna A. Curling In Support of Brief Regarding Standing (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 227
997	Transcript of Donna Curling depo (Jan. 19, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 228
998	Secretary of State press release "Secretary Raffensperger Calls On Department Of Justice To Investigate Allegations Of Fulton County Shredding Applications" (Oct. 11, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 229
999	Transcript of Donna Price depo (Mar. 8, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 230
1000	Declaration of Donna Price in support of standing (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 231
1001	Declaration of Jeffrey H. E. Schoenberg In Support of Brief on Standing (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 232
1002	Transcript of Jeffrey Schoenberg depo (Oct. 19, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 233
1003	Declaration of Donna Price (Oct. 4, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 234
1004	Declaration of Jeffrey Schoenberg (Oct. 4, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 235

Exhibit No.	Document Description	Document Type
1005	Declaration of Jeffrey Schoenberg (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 236
1006	Screenshot of video "Universite de Geneve (UNIGE), How to safeguard democracy? A look back at the last American presidential election. Gabriel Sterling, YouTube (Oct. 4, 2021, uploaded Nov. 25, 2021)" with quote	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 237
1007	Declaration of Jeffrey Schoenberg (Aug. 7, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 238
1008	Declaration of Amber F. Reynolds (Aug. 20, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 239
1009	Email chain between Alex Wan and Richard Barron and Marilyn Marks RE: Important report on Dominion system (Apr. 21, 2021	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 243
1010	Email chain between Marilyn Marks, Fulton Election Board and numerous individuals from the City of Atlanta, Sandy Springs, Johns Creek, Roswell, Alpharetta RE: Fulton OfficialsUrgent Voting Protections RequiredNeeded Actions (June 6, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 244
1011	Email chain between Marilyn Marks and Richard Barron RE: FW: Correspondence to	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 245

Exhibit	Document Description	Document Type
No.	Bootiness Besoftpoor	Bootiment Type
	Fulton last month re scanner issue (July 8, 2020)	
1010		DI :
1012	Email chain between Marilyn Marks and Fulton County Election Board RE: Urgent Issues for BRE Consideration- -Voting System Problems (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 246
1013	Email chain between Felicia	Plaintiffs' Exhibits in Support of
	Strong-Whitaker and Janay Wilborn, Robb Pitts, and Richard Barron RE: Logic and Accuracy Test for August election (July 8, 2020)	Opposition to Defendants' Motions for Summary Judgment Exhibit 247
1014	Email chain between Timothy Cummings and Dwight Brower, Michael Barnes RE: Voter with Double QR Codes on Ballot (Oct. 22, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 248
1015	Transcript of Cathleen Latham depo (Aug. 8, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 249
1016	Screenshots of Coffee County video footage (Jan. 7, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 250
1017	Screenshots of Coffee County video footage (Jan. 7, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 251
1018	Screenshot of Tweet thread between Ben Adida and David Cross (Oct. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 252

Exhibit	Document Description	Document Type
No.		
1019		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Transcript of Benjamin	for Summary Judgment Exhibit
	Cotton depo (Aug. 25, 2022)	253
1020		Plaintiffs' Exhibits in Support of
	Powerpoint re: Cybersecurity	Opposition to Defendants' Motions
	Considerations for Voting	for Summary Judgment Exhibit
	Systems by Wenke Lee	254
1021		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration of Kevin	for Summary Judgment Exhibit
	Skoglund (Dec. 5, 2022)	255
1022		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration of Benjamin	for Summary Judgment Exhibit
	Cotton (June 8, 2022)	256
1023		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Transcript of Doug Logan	for Summary Judgment Exhibit
	depo (Nov. 18, 2022)	257
1024	Shipping confirmation "FW:	Plaintiffs' Exhibits in Support of
	Coffee County Forensics	Opposition to Defendants' Motions
	FEDEX Request" (Apr. 27,	for Summary Judgment Exhibit
	2021)	258
1025	Secretary of State	Plaintiffs' Exhibits in Support of
	Investigation report RE:	Opposition to Defendants' Motions
	Coffee County - Miscellaneous	for Summary Judgment Exhibit
	- SEB2020-250 (Sept. 28,	259
	2021)	

Exhibi	Document Description	Document Type
1026	Screenshot of video "The Carter Center, Restoring Confidence in American Elections Panel 3 -April 29, 2022, YouTube (May 9, 2022)" of Gabriel Sterling with quote "So we are still dealing with that here and we still have to prove negatives in all these cases. It's similar across the board. But like, we had claims even recently there was people saying: 'We went to Coffee County. We imaged everything.' There's no evidence of any of that. It didn't happen."	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 260
1027	Secretary of State press release "Georgia's 2022 Statewide Risk Limiting Audit Confirms Results" (Nov. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 261
1028	Transcript of Proceedings before the Honorable Judge John J. Tuchi - Motion Hearing in Kari Lake v. Katie Hobbs (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 262
1029	Photos of tags with flashdrives redacted	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 263
1030	Transcript of J. Alex Halderman depo (Jan. 3, 2023)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 264
1031	Transcript of Alex Andrew Cruce depo (Nov. 22, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 265

Exhibit No.	Document Description	Document Type
1032	Transcript of Blake Edward Voyles depo (Nov. 16, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 266
1033	Photos of tags with flashdrives redacted	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 267
1034	Screenshot of text message thread from Eric Chaney (March 2018 - March 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 268
1035	Email chain between Paul Maggio and Sidney Powell RE: 55A1722: Jim Penrose - Coffee County GA Forensics Engagement Agreement (Jan. 8, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 269
1036	Email chain between Steven Ellis and Anthony Rowell, Ryan Germany RE: Coffee County SEB investigation (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 271
1037	Transcript of telephone discovery conference (Apr. 7, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 272
1038	Declaration of Donna A. Curling (May 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 273
1039	Declaration of Donna Price (May 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 274
1040	Declaration of Jeffrey H. E. Schoenberg In Support of Motion for Preliminary Injunction (May 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 275

Evhihi	Dogument Description	Dogument Type
No.	Document Description	Document Type
1041	Publication in Election Law	Plaintiffs' Exhibits in Support of
1041	Journal "Ballot-Marking	Opposition to Defendants' Motions
	Devices (BMDs) Cannot	for Summary Judgment Exhibit
	Assure the Will of the Voters"	287
	(Feb. 14, 2020)	
1042	Fulton County Defendants'	Plaintiffs' Exhibits in Support of
	Response to Plaintiffs' Second	Opposition to Defendants' Motions
	Request for Admission (Aug.	for Summary Judgment Exhibit
	30, 2021)	290
1043	Email chain between Robert	Plaintiffs' Exhibits in Support of
	McGuire and Josh Belinfante,	Opposition to Defendants' Motions
	Bruce Brown, Cary Ichter,	for Summary Judgment Exhibit
	David Cross, Marilyn Marks,	291
	and Jill Connors RE:	
	Coalition's request for missing	
	discovery files (Mar. 25, 2022)	
1044		Plaintiffs' Exhibits in Support of
		Opposition to Defendants' Motions
	Declaration of Donna A.	for Summary Judgment Exhibit
	Curling (Oct. 4, 2019)	293
1045		Plaintiffs' Exhibits in Support of
	Declaration (Supplemental) of	Opposition to Defendants' Motions
	Marilyn Marks (Feb. 12,	for Summary Judgment Exhibit
10.40	2021)	294
1046	Declaration of Donna A.	Plaintiffs' Exhibits in Support of
	Curling In Support of Plfs'	Opposition to Defendants' Motions
	Motion for Preliminary	for Summary Judgment Exhibit
1047	Injunction (Aug. 19, 2020)	Districted Exhibits in Support of
1047		Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions
	Declaration of Donna Price	for Summary Judgment Exhibit
	(Aug. 19, 2020)	298
1048	(114g. 10, 2020)	Plaintiffs' Exhibits in Support of
	Declaration (Supplemental) of	Opposition to Defendants' Motions
	Kevin Skoglund (July 27,	for Summary Judgment Exhibit
	2022)	301
L	/	<u>l = = </u>

Exhibit No.	Document Description	Document Type
1049	Harrison Floyd Consolidated Opposition to Motions to Quash Subpoenas	Court Filing - State of Georgia v. Harrison Floyd, et al., 23SC188947 (Fulton County Superior Court)
1050	Matthew Bernhard, Allison McDonald, Henry Meng, Jensen Hwa, Nakul Bajaj, Kevin Chang, and J. Alex Halderman. "Can Voters Detect Malicious Manipulation of Ballot Marking Devices?," 2020 IEEE Symposium on Security and Privacy (SP), San Francisco, CA, USA, 2020, pp. 679-694, doi: 10.1109/SP40000.2020.00118. May 2020. https://doi.org/10.1109/SP400 00.2020.	https://ieeexplore.ieee.org/document/9152705
1051	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to BMD verification rates for ballots.	Tweet
1052	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to BMD verification rates for ballots and the lack of study of paper ballots.	Tweet
1053	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to verification rates.	Tweet
1054	2021.04.12 Screenshot of Tweet from Matt Bernhard relating to the market for voting equipment.	Tweet
1055	2021.04.12 Screenshot of Tweet from Matt Bernhard	Tweet

Exhibit No.	Document Description	Document Type
110.	relating to Americans who don't like paper ballots.	
1056	2021.03.18 Screenshot of Tweet from Matt Bernhard relating to "cosmic rays" affecting voting machines.	Tweet
1057	2021.03.18 Screenshot of Tweet from Matt Bernhard relating to "cosmic rays" affecting voting machines, and providing source.	Tweet
1058	2020.10.26 Screenshot of Tweet from Matt Bernhard relating to "fearmongering advocates" helping supress voter turnout.	Tweet
1059	2020.10.12 Screenshot of Tweet from Matt Bernhard responding to Michigan Engineering for avoiding voting if no paper trail.	Tweet
1060	2020.10.12 Screenshot of Tweet from Matt Bernhard stating that his study did not find that "almost 95% of votes don't review their printouts."	Tweet
1061	2020.10.12 Screenshot of Tweet from Matt Bernhard clarifying that "40% of our participants reviewed their ballots."	Tweet
1062	2020.11.21 Screenshort of Tweet from Alex Halderman stating that the risk-limiting audit in Georgia was positive. Gabriel Sterling replying.	Tweet

Exhibit No.	Document Description	Document Type
1063	2020.11.15 Screenshort of Tweet from Alex Halderman stating that "I've seen no credible evidence whatsover that the 2020 presidential outcome was hacked."	Tweet
1064	2020.11.13 Screenshot of Tweet from Alex Halderman retweeting Frank Bajak regarding U.S. election security challenges.	Tweet
1065	2020.11.12 Screenshot of Tweet from Alex Halderman reponding from a tweet of Donald Trump regarding Dominion not having deleted votes.	Tweet
1066	2020.11.24 Screenshot of Tweet from Alex Halderman reponding to Julian Sanchez saying that "the strongest claim real election security experts can make is that hacking outomces would be 'complicated' and there's no credible evidence it happened."	Tweet
1067	2020.11.15 Screenshot of Tweet from Alex Halderman reponding to Tweet from Joseph Nierenberg.	Tweet
1068	2020.11.15 Screenshot of Tweet from Alex Halderman reponding to Tweet from Joseph Nierenberg. Halderman stated that "If an attacker can falsely convince people the results are wrong, that's also a security failure."	Tweet

Exhibit No.	Document Description	Document Type
1069	2020.11.15 Screenshot of Tweet from Alex Halderman reponding to Tweet from Joseph Nierenberg regarding election security.	Tweet
1070	2020.11.11 Screenshot of Tweet from Alex Halderman regarding Georgia's previous voting machines.	Tweet
1071	2020.11.11 Screenshot of Tweet from Alex Halderman regarding voters voting by different methods.	Tweet
1072	2020.11.24 Screenshot of Tweet from Alex Halderman replying to John Moser regarding auditing ballots.	Tweet
1073	2020.11.24 Screenshot of Tweet from Alex Halderman replying to John Moser regarding forensic analysis.	Tweet
1074	2023.10.15 Screenshot of Tweet from Marilyn Marks regarding Sidney Powell motion and Fani Willis.	Tweet
1075	2021.07.10 Screenshot of Tweet from Marilyn Marks stating that BMDs are not safe to vote on.	Tweet
1076	2021.08.23 Screenshot of Tweet from Marilyn Marks responding to PeepleWatcher regarding explaining what a BMD ballot looks like.	Tweet
1077	2021.07.10 Screenshot of Tweet from Marilyn Marks telling people to ask their GA officials to read Andrew Appel's newest report.	Tweet

Exhibi	Document Description	Document Type
No.	•	
1078	2022.01.20 Screenshot of	Tweet
	Tweet from Marilyn Marks	
	stating that "there's no	
	evidence that widespread	
	fraud or hacking occurred."	
1079	2021.09.11 Screenshot of	Tweet
	Tweet from Marilyn Marks	
	regarding California voters.	
1080	2021.09.12 Screenshot of	Tweet
	Tweet from Marilyn Marks	
	regarding not being affiliated	
	with the GOP.	
1081	2021.09.12 Screenshot of	Tweet
	Tweet from Marilyn Marks	
	regarding RLAs	
1000	implementation.	m ·
1082	2021.09.12 Screenshot of	Tweet
	Tweet from Marilyn Marks	
	regarding audit for California	
1083	recall. 2021.09.12 Screenshot of	Tweet
1083		Tweet
	Tweet from Marilyn Marks	
	regarding "citizen inspections" shouldn't be	
	called audits.	
1084	2021.11.23 Screenshot of	Tweet
1004	Tweet from Marilyn Marks	1 WOOL
	regarding the 2020 election.	
1085	2021.09.04 Screenshot of	Tweet
1000	Tweet from Marilyn Marks	1550
	regarding doing verification	
	work during when GA law	
	permitted it.	
1086	2021.04.08 Screenshot of	Tweet
	Tweet from Kevin Skoglund	
	regarding election not needed	
	to be easy/hard to hack.	

Exhibit No.	Document Description	Document Type
1087	2021.04.08 Screenshot of Tweet from Kevin Skolgund regarding reliability of election equipment.	Tweet
1088	2021.04.08 Screenshot of Tweet from Kevin Skolgund regarding malware affecting election results.	Tweet
1089	2021.02.10 Screenshot of Tweet from Kevin Skoglund regarding cendors being able to do both hardware and software engineering change orders.	Tweet
1090	2021.02.10 Screenshot of Tweet from Kevin Skoglund regarding his knowledge of de minimis software changes allowed prior to memo from November 2019.	Tweet
1091	2021.02.10 Screenshot of Tweet from Kevin Skoglund replying to Eddie Perez regarding de minimus sofware changes before 2019.	Tweet
1092	2020.11.16 Screenshot of Tweet from Kevin Skoglund regarding signing letter rebuking Trump's claims as fraud and unsubstantiated.	Tweet
1093	2020.09.19 Screenshot of Tweet from Kevin Skoglund to election officials asking to contact their IT departments for weekly data backups.	Tweet
1094	2020.08.08 Screenshot of Tweet from Ash's Night Fury to Kevin Skoglund regarding	Tweet

Exhibit No.	Document Description	Document Type
	voting systems connected to the internet.	
1095	2020.08.08 Screenshot of Tweet from Kevin Skoglund responding to Ash's Night Fury regarding not observing modems sold to all states listed.	Tweet
1096	2020.11.29 Screenshot of Tweet from Philip Stark replying to RedPillMagaMom regarding his interviews with MSM and Fox.	Tweet
1097	2020.11.20 Screenshot of Tweet from Philip Stark replying to Ben Adida regarding reconciled paper trail and standard ballot accounting.	Tweet
1098	2020.11.08 Screenshot of Tweet from Philip Stark regarding risk-limiting audit.	Tweet
1099	2020.11.08 Image from Philip Stark Tweet. Image of ballots cast in 2020 contest per candidate. Risk limit audit shown for 5%.	Image contained in Tweet
1100	Marilyn Marks Tweet thread, November 21, 2020	https://twitter.com/MarilynRMarks 1/status/1330418629658218497
1101	Marilyn Marks Tweet thread, November 22, 2020	https://twitter.com/MarilynRMarks 1/status/1330418629658218497
1102	Email from Marilyn Marks to Stephen Day, FW: Non- compliant "recount"/"RLA" November 13, 2020	CGG2021001276675 to CGG2021001276680

Exhibi	Document Description	Document Type
1103	Jeanne Dufort Tweet, November 22, 2020	https://twitter.com/dufort_jeanne/st atus/1330733994070118400
1104	Marilyn Marks Tweet thread, November 14, 2020	https://twitter.com/MarilynRMarks 1/status/1327705945569447936
1105	Marilyn Marks Tweet thread, October 24, 2020	https://twitter.com/MarilynRMarks 1/status/1320085428062617602
1106	Marilyn Marks Tweet thread, November 17, 2020	https://twitter.com/MarilynRMarks 1/status/1328745280645246976
1107	Marilyn Marks Tweet thread, November 17, 2020	https://twitter.com/MarilynRMarks 1/status/1328758039395131392
1108	Marilyn Marks Tweet thread, January 24, 2021	https://twitter.com/MarilynRMarks 1/status/1353392784724553734
1109	Marilyn Marks Tweet thread, January 12, 2021	https://twitter.com/MarilynRMarks 1/status/1349014884277768199
1110	Marilyn Marks Tweet thread, January 1, 2021	https://twitter.com/MarilynRMarks 1/status/1345217977835266048
1111	2021.02.14 Email to marilyn@uscgg.org referencing attachment "Georgia Republican Party Election Conference Task Force Report-Final.pdf"	CGG20220000001
1112	Georgia Republican Party Election Conference Task Force Report	CGG20220000002-10
1113	2020.12.26 Email to marilyn@uscgg.org re: https://fb.watch/2DAvX-2yAo/	CGG20220000011
1114	2020.12.25 Email to marilyn@uscgg.org re: My counties. (List of counties under her caucaus: "They all have populations under 80,000"	CGG20220000012-13

Exhibit	Document Description	Document Type
No.	r.	J. P.
1115	Email to marilyn@uscgg.org dated 12.27.2020 re:Please proof this and let me know. I will attach the letter when I send to him.	CGG20220000014
1116	Email to marilyn@uscgg.org dated 02.21.2021 re: BMDs do not meet the 2016 HB16 requirements	CGG20220000015
1117	Email to Marilyn Marks dated 12.27.2020 re: Early opening of AB mail ballots; "You are not the Grinch!	CGG20220000016-17
1118	Email to Marilyn Marks dated 02.16.2021 re: Even Gov. Kemp Would Be Denied a Ballot	CGG20220000018-20
1119	Email to Marilyn Marks dated 08.03.2011 re: Excellent Experts' reports served tonight -All public information	CGG20220000021
1120	Email to Marilyn Marks dated 08.14.2021 re: FW: Replace the Dominion System Before the 2022 Primary InsiderAdvantageGeorgia	CGG20220000022-23
1121	Email to Marilyn Marks dated 12.29.2020 re: Ed Voyles	CGG20220000024
1122	Email to Marilyn Marks dated 12.27.2020 re: Lamar County GOP chair	CGG20220000025
1123	Email to Marilyn Marks dated 12.27.2020 re: Lamar County GOP chair	CGG20220000026

Exhibit No.	Document Description	Document Type
1124	Email to Marilyn Marks dated 08.15.2021 re: Replace the Dominion System Before the 2022 Primary InsiderAdvantageGeorgia	CGG20220000027-28
1125	Email to Marilyn Marks dated 02.14.2021. Re: Tip of iceberg disclosure of tabulation and system problems	CGG20220000029
1126	Email to Marilyn Marks dated 10.21.2021 re: Update (Response from Cobb County attorney requesting tomorrow to answer questions)	CGG20220000030
1127	Email to Marilyn Marks dated 09.20.2022 FW: SOS - Expert report affirms accuracy of Antrim County presidential election results	CGG20220000031-32
1128	03.26.2021 Report entitled Analysis of the Antrim County, Michigan November 2020 Election Incident by J. Alex Halderman	CGG20220000033-86
1129	Email to Marilyn Marks dated 12.26.2020 re: 10:45 ET? Re: Zoom Call	CGG20220000087
1130	Email to Marilyn Marks dated 12.27.2020 re: My counties	CGG20220000088-90
1131	Email to Marilyn Marks dated 2020.12.26 re: zoom call	CGG20220000091
1132	Email from Marilyn Marks to Ed Voyles, Misty Hampton, and Cathy Latham dated 02.20.2021 re: Local Option	CGG20220000092

Fyhihi	Dogument Description	Dogument Type
No.	Document Description	Document Type
	for HMPB-exists today if lines	
	are longer than 30min	
1133	Georgia Regulation Ga.	CGG20220000093-96
	Comp. R & Regs. R. 183-1-12-	
	.11 Conducting Elections	
1134	Email to Marilyn Marks	CGG20220000097-100
	dated 06.12.2021 to Cathy	
	Latham re: demanding \$75	
	million refund	
1135	Email to Marilyn Marks	CGG20220000101
	dated 12.26.2020 re: 10:45	
	ET? Re: Zoom Call	
1136	Email from Marilyn Marks to	CGG20220000102
	Cthay Latham, Ed Voyles re:	
	Annotations on Hutton-	
	pulitzer testimony attaching	
	GAsenateJudiciary12.3.2020	
1107	Part 1_MRM jhp2.dockx	GGG2022000102 20
1137	GA Senate Judiciary Sub-	CGG20220000103-20
	committee on Election Law	
1138	12.30.2020 Email from Marilym Marks to	CGG20220000121
1190	Email from Marilyn Marks to Welch47@protonmail.com;	00020220000121
	Cathy Latham re: Cobb	
	official recount docs	
	attachments: Official and	
	Complete - Election Summary	
	Report.pdf, Official and	
	Complet - SOVC.pdf	
1139	Election Summary Report	CGG20220000122
1140	Statement of Votes Cates	CGG20220000123-137
	General Election COBB dated	
	11.03.2020	

Exhibit No.	Document Description	Document Type
1141	Email from Marilyn Marks to Cathy Latham re: Dominion Contract Info, Attachments: 20190729-FA-Dominion- Contract.pdf, "Pages from Dominion021577-026667- 6copy.pdf	CGG20220000138
1142	Master Solution Purchase and Services Agreement between Dominion Voting Systems and Secretary of State of the State of Georgia (July 29, 2019)	CGG20220000139-250
1143	Email from Mike Frontera to Ryan Germany dated 03.02.2020 re:Updated Amendement; Attachment GASOS Amendment 1 03.02.2020.docx	CGG20220000251-256
1144	Amendment I to the Master Solution Ppurchase and Services Agreement between Dominion Voting Systems, Inc. and The Secretary of State of the State of Georgia	CGG20220000257-261
1145	Email from Marilyn Marks to Cathy Latham re: FW: "Emergency" Rule for mandatory early scanning of ballots	CGG20220000262-63
1146	Email from Marilyn Marks to welch47@protonmail.com; Cathy Latham; Pam Ausman re: FW: You Make the Laws. I'll Make ther Rules!"	CGG20220000264-265
1147	Email from Marilyn Marks to Cathy Latham and Ed Volyles re: Authority of County boards to use hand marked paper ballots	CGG20220000266

	Document Description	Document Type
No.		
1148	Report/Presentation: When	CGG20220000267-271
	using BMDs "Wholly Or in	
	Part is Not Practicable"	
1149	Correspondence from Brown	CGG20220000272-276
	to Cheryl Ringer dated	
	10.03.2020 re: Fulton County	
	Board of Elections' Ongoing	
	Violations of State law	
1150	Article - Georgia's US Senate	CGG20220000277-290
	Runoff Races at Risk - A	
	Modest Proposal for a	
	Defensible Vote Count	
1151	Email from Marilyn Marks	CGG20220000291
	dated 07.12.2021 to Cathy	
	Latham re: FW: Essential	
	new report in BMD court case	
	against SOS	
1152	Expert Report of Andrew W.	CGG20220000292-323
	Appel dated 6.28.2021	
1153	Rule 5.4 Certificate of Service	CGG20220000324-325
	of Discovery (Expert Report of	
	Appel and Halderman)dated	
	07.01.2021	
1154	Email from Marilyn Marks	CGG20220000326
	dated 08.03.2021 re: FW:	
	Excellent Experts' reports	
	served tonight - All public	
1155	information	
1155	REBUTTAL REPORT OF	CGG20220000327-337
	ANDREW W. APPEL (July	
1170	30, 2021)	GGG9999999999999
1156	Declaration of J. Alex	CGG20220000338-361
11 -	Halderman dated 08.02.2021	CCC00000000000000000000000000000000000
1157	Eighth Declaration of Philip	CGG20220000362-405
	B. Stark dated 08.02.2021	
1158	Email from Marilyn Marks to	CGG20220000406-407
	Cathy Latham dated	
	08.03.2021 re: FW: Facing	

Exhibit No.	Document Description	Document Type
	Critical Decisions on Upcoming Municipal Elections	
1159	Email from Marilyn Marks to Cathy Latham re: FW: Halderman report Update	CGG20220000408
1160	Exhibit A to Halderman report	CGG20220000409-419
1161	Transcript of Motions hearing Proceedings Before the Honorable Amy Totenberg dated 11.19.2021	CGG20220000420-539
1162	Curling Plainiffs' Reply in Support of Plaintiffs' Motion to Sever dated 11.15.2021	CGG20220000540-680
1163	Email from Marilyn Marks to Caty Lathat,cc: Ed Voyles re: Judhe Totenberg opinion re: BMD ballots and GA law	CGG20220000681-682
1164	Opinion and Order dated 10.11.2020	CGG20220000683-829
1165	Report - Georgia's US Senate Runoff Races at Risk - A Modest Proposal for a Defensible Vote Count	CGG20220000830-843
1166	Email from Marilyn Marks to Cathy Latham dated 02.28.2021 re: FW: Previous letter re: demanding a475 million refund	CGG20220000844-847
1167	Email from Marilyn Marks to Cathy Latham re: FW: Previous letter re: demanding \$75 million refund	CGG20220000848-851
1168	Email from Marilyn Marksto Ed Voyles and Cathy Latham re: FW: Problems created by	CGG20220000852-853

Exhibit No.	Document Description	Document Type
	omnibus bills - and proposed solutions	
1169	Email from Marilyn Marks to Cathy Latham dated 07.30.2021 re" FW": Prof.Alex Halderman's sealed report is subject of discovery dispute heard on Monday	CGG20220000854-855
1170	Joint Discovery Statement Regarding Access to Plaintifs' Expert Report and Unduly Burdensome Discovery dated 07.12.2021	CGG20220000856-905
1171	Exhibit B to to Joint Disco Statement	CGG20220000906-912
1172	Transcript of Telephone Conference Proceedings Before the Honorable Amy Totenberg dated 07.26.2021	CGG20220000913-998
1173	Email from Rhonda J. Martin to welch47 and Cathy Lathat re: FW: Proposed Changes to Proposed Rules 183-1-12-12 and 183-1-12-13	CGG20220000999
1174	Martin Memo to State Election Board attaching revisions to Proposed Rules 183-1-12-12 and 183-1-12-13 Tabulating Results and Storage of Returns respectively	CGG20220001000-1009
1175	Email from Marilyn Marks to Cathy Latham, Ed Voyles re: FW: Request to AJC for clarification - FW: Georgia braces for contentious fight over Senated runoff results	CGG20220001010-1014

Fwhihi	Decument Description	Dogument Type
No.	Document Description	Document Type
1176	Email from Marilyn Marks	CGG2022000101015
1170	forwarding email from	0002022000101019
	Moghimi, Madeline to Cathy	
	Latham, Ed Voyles, Misty	
	Hampton re: FW: Request to	
	make public comment HB531	
1177	Email from Marilyn Marks	CGG2022000101016
	forwarding email to welch47;	
	Cathy Latham dated	
	10.22.2021 re "October 28,	
	2021 re: FW: State Election	
	Board Agenda.pdf	
1178	Agenda State Election Board	CGG2022000101017
	via Webinar (Office of	
	Secretary of State) dated	
	10.28.2021 9:00 a.m.	
1179	Email from Marilyn Marks	CGG2022000101018
	dated 09.19.2021 forwarding	
	to Cathy Latham re: FW:	
	State Election Board Agenda -	
	September 21, 2021	
1180	Agenda State Election Board	CGG2022000101019-1021
	via Webinar (Office of	
	Secretary of State) dated	
1101	09.21.2021 9:00 a.m.	GGG0000010101000
1181	Email from Marilyn Marks to	CGG202200010101022
	Cathy Latham dated	
	09.19.2021 re: FW: State	
	Election Board - Notice of Rules Posted for Public	
1182	Comment State Election Board Notice of	CGG202200010101023-1084
1104	Proposed Rulemaking	CGG202200010101023-1084
	Revisions to Subject 183-1-12:	
	Preparation for and Conduct	
	of Primaries and Elections	
	of filliaries and Elections	

Exhibit No.	Document Description	Document Type
1183	State Election Board Notice of Proposed Rulemaking Revisions to Subject 183-1-14: Absentee Voting	CGG20220001085-1095
1184	Email from Marilyn Marks to Cathy Latham and Ed Voyles dated 12.27.2020 re: Lets's discuss as alternative when we talk	CGG20220001096
1185	Email from Marilyn Marks to Cathy Latham with cc to welch47@protonmail.com re: Marietta tapes	CGG20220001097
1186	Email from Marilyn Marks to Cathy Latham dated 02.21.2021 re: BMDs do not meet the 2016 HB16 requirements	CGG20220001098-1099
1187	Email from Marilyn Marks to Cathy Latham re: Dominion BMD voting system FW: Exerpts from Judge T's opinion and highlights of her opinion	CGG20220001100
1188	Opinion and Order dated 10.11.2020	CGG20220001101-1247
1189	Exhibit 5 Excerpts from 10.11.20 Ruling - Judge Amy Totenberg	CGG20220001248-1251
1190	Email from Marilyn Marks to Cathy Latham dated 08.05.2021 re: Dominion System "reexamination" attaching "Petition Recent annotated.pdf"	CGG20220001252
1191	Correspondence from Marilyn Marks to The Honorable Brad Raffensperger requesting	CGG20220001253-1263

Evhibit	Dogument Description	Dogument Type
No.	Document Description	Document Type
110.	reexamination of the	
	Dominion Votiing System	
	Dominion vooling bystem	
1192	Email from Marilyn Marks to	CGG20220001264-1265
	Ed Voyles, Cathy Latham	
	dated 12.27.2020 re: Early	
	opening of AB mail ballots	
1193	Email from Marilyn Marks to	CGG20220001266
	Cathy Latham re: Excellent	
	Experts' reports served	
	tonightAll public	
1104	information No. 1. No. 1.	GGG202200120E
1194	Email from Marilyn Marks to	CGG20220001267
	Caty Latham dated	
	12.26.2020 re: Lamar County GOP Chair	
1195	Email from Marilyn Marks	CGG20220001268-1269
1130	dated 102.22.2021 to Cathy	CGG202220001208-1209
	Latham, Pam Ausman,	
	welch47@protonmail.com re:	
	Marietta tapes	
1196	Email to Cathy Latham dated	CGG20220001270-1272
	12.26.2020 re: My counties	
1197	•	CGG20220001273-1274
1197	Email from Marilyn Marks to Cathy Latham dated	CGG20220001275-1274
	08.14.2021 re: Replace the	
	Dominion System Before the	
	2022 Primary	
	InsiderAdvantageGeorgia	
1198	Email from marilyn Marks to	CGG20220001275-1276
	Ed Voyles and Cathy Latham	
	re: Secret ballotFW:	
	Election officials travel to	
	Coffee County, Georgia to	
	begin investigation KDNL	

Exhibit No.	Document Description	Document Type
1199	Email from Marilyn Marks to Cathy Latham dated 02.14.2021 with cc to Ed Voyles re: Tip of iceberg disclosure of tabulation and system problems	CGG20220001277
1200	Email from Marilyn Marks to welch47@protonmail.com and Cathy Latham dated 10.20.2021 re previous meeting of SEBFW: Comments on Proposed Rule making with attachments: "CGG Comments on Rulemaking 09.20.21.pdf"	CGG20220001278
1201	Coalition of Good Governance's Summary Comments on Proposed Election Rules	CGG20220001279-1286
1202	Email form Marliyn Marks to Cathy Latham and Ed Voyles dated 02.14.2021 re: Redacted Experts Report filed with Court attachments: "2021-02- 12 Halderman Redaction [dckt 1070_0]][1].pdf	CGG20220001287
1203	Declaration of J. Alex Halderman dated 02.12.2021	CGG20220001288-1297
1204	Email to Marilyn Marks dated 02.14.2021. Re: Tip of iceberg disclosure of tabulation and system problems; attaching: "Marks Declaration 20210212 CGG Doc. 1071 CGG Brief on Standing and Exhibits-2.pdf"	CGG20220001298
1205	Supplemental Declaration of Marilyn Marks dated 02.12.2021	CGG20220001299-1330

Evhihi	Dogument Description	Document Type
No.	Document Description	Document Type
1206	Email from Marilyn Marka to	CGG20220001331
1200	Email from Marilyn Marks to Cathy Latham with cc to Ed	CGG202220001331
	Voyles dated 12.26.2020 re:	
	Transcript of 11/23 Meeting	
	re: Rough draft letter for	
	Blackmon; attaching:	
	"SEBspecialMtg23Nv2020_ott	
1907	er.ai partial edits.docx"	CCC90990001999 1956
1207	SEBspecialMTg23Nov2020	CGG20220001332-1356
	(unofficial rought transcript) 11/23	
1208		CGG20220001357
1200	Email from Marilyn Marks to Cathy Latham dated	CGG20220001337 -
	10.21.2021 re: Update;	
	attaching "Screen shot 2021-	
1209	10-21 at 11.57.42 AM.png" Highlighted excerpt obtained	CGG20220001358
1209	from Curling case	CGG202220001558
	teleconference 10.07.21 Topic	
	SOS witholding discovery	
	responses: highlights -	
	"suspected and possibly	
	actual compromises of	
	components of the election	
	system. We are on a public	
	call. So I'm not going to get	
	into specifics about that"	
1210	Email from Marilyn Marks to	CGG20220001359
	Cathy Latham and Ed Voyles	
	dated 12.26.2020 re: What if	
	Coffee County (and maybe	
	other counties) led the way	
	with two security measures?	
1211	Email from Marilyn Marks to	CGG20220001360
	Misty Hampton, Ed Voyles,	
	and Cathy Latham dated	
	12.30.2020 re: You will find	
	this iinteresting from our	

Exhibit	Document Description	Document Type
No.		
	case; attaching: "809-3 Harri	
	declaration.pdf	
1212	Declaration of Harri Hursti	CGG20220001361
	dated 08.24.2020	

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' EXHIBIT LIST

Objection	Objection Explanation	
Abbreviation		
A	Lack of Authenticity. The State has not established that it is a	
	true and correct copy of the document through proper foundation	
	(Fed. R. Evid. 901 & 902)	
\mathbf{F}	Lack of Foundation. Plaintiffs object to this exhibit on the	
	ground that the foundation necessary for its admission has not	
	been laid and is not laid in the exhibit itself. (Fed. R. Evid. 602)	
IS	Improper Summary. Plaintiffs object to this exhibit as an	
	improper summary under Federal Rule of Evidence 1006.	
104	Relevance depends on facts not established. Plaintiffs	
	object to this exhibit on the ground that the relevance of this	
	evidence depends on whether a fact exists, and no proof or	
	evidence has been adduced during discovery sufficient to support	
	a finding that the fact does exist.	
H	Hearsay. Plaintiffs object to the State introducing this exhibit	
	because it constitutes or contains hearsay and/or hearsay within	
	hearsay and no exception applies. (Fed. R. Evid. 801 & 802, 805)	
NR	Not Relevant. Plaintiffs object to this exhibit because it is not	
	relevant to any issue to be decided in this litigation. (Fed. R.	
	Evid. 401 & 402)	
403	FRE 403. Plaintiffs object to this exhibit because its probative	
	value is substantially outweighed by a danger of one or more of	
	the following: unfair prejudice, confusing the issues, misleading	
	the jury, undue delay, wasting time, or needlessly presenting	
NP	cumulative evidence. (Fed. R. Evid. 403) Not Produced During Discovery. Plaintiffs object to this	
141	exhibit because the document and/or underlying data was not	
	produced during the course of discovery.	
T	Incomplete. Plaintiffs object to this exhibit because the exhibit,	
•	as submitted, does not contain the complete document. (Fed. R.	
	Evid. 106.) Plaintiffs reserves all objections as to the remainder	
	of the document.	
M	Multiple Documents. Plaintiffs object to this exhibit because it	
	contains more than one document. Plaintiffs reserve all rights to	
	object on additional grounds to any individual document.	
Q	Quality. Plaintiffs object to this exhibit because the exhibit, as	
	submitted, is illegible or otherwise of low quality. Plaintiffs	
	reserve all other objections.	
OW	Orignal Writing. Plaintiffs object to this exhibit because it is	
	not an original writing, recording, or photograph.	

Objection	Objection Explanation	
Abbreviation		
NE	Not Evidence. Plaintiffs object to this exhibit because it is a	
	statute, brief, pleading, order, discovery request, deposition	
	transcript, hearing transcript, expert report, expert analysis, or	
	declaration or an exhibit thereto and is not evidence.	
T	Transcript. Plaintiffs object to this exhibit because it is a	
	deposition transcript and it is not admissible as evidence under	
	Federal Rule of Civil Procedure 32. Plaintiffs reserve the right to	
	make any objection should the State attempt to introduce any	
	particular content of the transcript into evidence.	
\mathbf{C}	Cumulative. Plaintiffs objects to this exhibit on the ground that	
	it is duplicative and/or cumulative of other exhibits.	
PK	No Personal Knowledge. Plaintiffs object to this exhibit	
	because the author either does not have personal knowledge of	
	the information contained within, or the basis of that knowledge	
	has not been established. (Fed. R. Evid. 602)	
Unknown	Unknown Document. Plaintiffs object to this exhibit because	
	the State did not provide a copy of the document to Plaintiffs	
	pretrial, and thus Plaintiffs is without the ability to provide	
	objections. Plaintiffs reserve the ability to provide any and all	
	objections once the State provides Plaintiffs with copies of the	
	proposed exhibits.	
ID	Improper Description. Plaintiffs object to this exhibit because	
	the description fails to accurately indicate what document it	
	refers to, and thus Plaintiffs is without ability to provide	
	objections. Plaintiffs reserve the ability to provide any and all	
	objections once the State provides a corrected description.	

Exh	Document Description	Document Type	Objection
it No			S
1	2018.08.14 Declaration	Declaration	NE; H; F;
	of Merritt Beaver		C
	(Exhibit 1 to Defs' Kemp		
	and State Election Board		
	Response to Motions		
	for Preliminary		
	Injunction)		
2	2018.08.14 Declaration	Declaration	NE; H; F
	of Chris Harvey		
	(Exhibit 2 to Defs' Kemp		

Exh	Document Description	Document Type	Objection
it No			S
	and State Election Board		
	Response to Motions for		
	Preliminary Injunction		
3	2019.07.10 State	Declaration	NE; H; F
	Defendants' Combined		
	Response in Opposition		
	to Plaintiffs' Motions for		
	Preliminary Injunction -		
	Declaration of Michael		
	Shamos, Ph.D., J.D.		
4	Exhibit A to Declaration	Resume	NE; H; F;
	of Michael Shamos, Ph.D		
	472-1:		
	Resume of Michael Ian		
	Shanos		
5	2019.07.10 State	Declaration	NE; H; F
	Defendants' Combined		
	Response in Opposition		
	to Plaintiffs' Motions for		
	Preliminary Injunction -		
	Exhibit B - Declaration		
<u> </u>	of S. Merritt Beaver 2019.07.10 State	Declaration	NID. II. D
6	Defendants' Combined	Declaration	NE; H; F
	Response in Opposition		
	to Plaintiffs' Motions for		
	Preliminary Injunction -		
	Exhibit C - Declaration		
	of Theresa Payton		
7	2019.07.10 State	Declaration	NE; H; F;
	Defendants' Combined		
	Response in Opposition		
	to Plaintiffs' Motions for		
	Preliminary Injunction -		
	Exhibit D - Declaration		
	of Michael Barnes		

Exh	Document Description	Document Type	Objection
it No		•	s
8	Exhibit A to	Certified Record	OW; H; F;
	Declaration of Michael		NR
	Barnes - Certified copy		
	of the Direct Record		
	Electronic Voting		
	Machine Recap for		
	Fulton County precincts		
	06G, 02J, and 02K at the		
	Grady High School		
	Polling Location from the		
	2018 General Election		
	Held on November 6,		
	2018.		
9	2019.07.10 State	Pleading - Response	NE; H; F;
	Defendants' Combined		
	Response in Opposition		
	to Plaintiffs' Motions for		
	Preliminary Injunction -		
	Exhibit E - Rockdale Co.		
	Response to Subpoena		
10	2019.07.10 State	Declaration	NE; H; F;
	Defendants' Combined		
	Response in Opposition		
	to Plaintiffs' Motions for		
	Preliminary Injunction -		
	Exhibit F - Declaration		
	of Chatham Co		
	Elections Supervisor,		
11	Russell Bridges	D '' E ' M' 1 1	m II b I
11	2019.07.10 State	Deposition Excerpts - Michael	T; H; F; I;
	Defendants' Combined	Barnes Deposition	NE
	Response in Opposition		
	to Plaintiffs' Motions for		
	Preliminary Injunction - Exhibit G - Michael		
	Barnes Deposition		
	Excerpts		

Exh	Document Description	Document Type	Objection
it No	•		s
12	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit H - Jennifer Doran Deposition	Deposition Excerpts - Jennifer Doran Deposition	T; H; F; I; NE
13	Excerpts 2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit I - T. Lynn Ledford Deposition Excerpts	Deposition Excerpts - Lynn Ledford Deposition	T; H; F; I; NE
14	2019.07.10 State Defendants' Combined Response in Opposition to Plaintiffs' Motions for Preliminary Injunction - Exhibit J - Michael Barnes Deposition Transcript	Deposition Transcript	T; H; F; NE
15	2020.08.24 Exhibit 1 to Defs' Emergency Mot for Expedited Discovery for Preliminary Iinjunction Hearing - State Defs' Second RPDs to Curling Plaintiffs dated 08.21.2020	Discovery	NE; NR; H; F
16	2020.08.24 Exhibit 2 to Defs' Emergency Mot for Expedited Discovery for Preliminary Iinjunction Hearing - Email thread from Cross to Belifnante et al re Curling - RPDs to	Email	NE; NR; 403; H; F;

Exh	Document Description	Document Type	Objection
16 100	Curling Plaintiffs and		S
	expedited discovery		
	concerns dated		
	08.21.2020		
17	2020.08.25 Exhibit 1 to	Declaration	NE; H; F;
	Response re Motion		NR
	forPreliminary		
	Injunction on paper		
	Pollbook Backups -		
	Affidavit Declaration		
	of Chris Harvey		
18	2020.08.26 Exhibit 1 (A)	Declaration	NE; H: F;
	to Preliminary Injunction		
	State Defendants'		
	Response in Opposition		
	to Curling Plaintiffs'		
	Fourth Motion for		
	Preliminary Injunction -		
	Exhibit A - Dec. of Dr.		
19	Eric D. Coomer 2020.08.26 Exhibit 2 (B)	Declaration	NE; H; F
19	to Preliminary Injunction	Declaration	NE, 11, F
	State Defendants'		
	Response in Opposition		
	to Curling Plaintiffs'		
	Fourth Motion for		
	Preliminary Injunction -		
	Exhibit B - Dec. of Juan		
	E. Gilbert, Ph.D		
20	2020.08.26 Exhibit 3 (C)	Deposition	T; NE; H;
	to Preliminary Injunction		F;
	State Defendants'		
	Response in Opposition		
	to Curling Plaintiffs'		
	Fourth Motion for		
	Preliminary Injunction -		
	Exhibit C - Part 1 -		
	Deposition of J. Alex		
	Halderman, Ph.D		

Exh	Document Description	Document Type	Objection
it No	_		S
21	2020.08.26 Exhibit 4 (C-	Compilation of Halderman	NE; M; H;
	2) to Preliminary	Deposition Exhibits 1 - 9	F; T
	Injunction State		
	Defendants' Response in		
	Opposition to Curling		
	Plaintiffs' Fourth Motion		
	for Preliminary		
	Injunction - Exhibit 2 -		
	Part 2 of 3 - Deposition		
	of J. Alex Halderman,		
	Ph.D and (Exs. 1-9)		
22	Halderman Deposition	Deposition Exhibit	NE; NR;
	Exhibit 1 - Expert Report		H; F
	of J.Alex Halderman		
23	Halderman Deposition	Deposition Exhibit	NE; A; H;
	Exhibit 2 - Expert		F; A
	Report of J.Alex		
	Halderman)
24	Halderman Deposition	Deposition Exhibit	NE; H; F;
	Exhibit 2 (A) of Expert		
	Report of J.Alex		
	Halderman -		
	Halderman CV	D D l l l	ND II D
25	Halderman Deposition	Deposition Exhibit	NE; H; F
	Exhibit 3 - Supplement		
	to the Expert Report		
26	of H. Alex Halderman	Danagition Embilit	II. E. A.
20	Halderman Deposition Exhibit 4 Website page	Deposition Exhibit	H; F; A;
	Exhibit 4 - Website page - Election Verification		104; NR
	Network Agenda for 2019		
	Conference dated		
	02.18.2020		
27	Halderman Deposition	Deposition Exhibit	H; F; A;
	Exhibit 5 - Website page	Doposition Dambit	104; NR
	- Election Verification		101,111
	Network About Us page		

	Document Description	Document Type	Objection
it No			S
28	Halderman Deposition	Deposition Exhibit	H; F;
	Exhibit 6 - U.S. House		
	Appropriations		
	Subcommittee on		
	Financial Service and		
	General Government		
	"Election Security:		
	Ensuring the Integrity of		
	U.S. Election Systems"		
29	February 17, 2019 Halderman Deposition	Denosition Exhibit	H; F
49	Exhibit 7- U.S. Senate	Deposition Exhibit	п; г
	Select Committee on		
	Intelligence Russian		
	Interference in the 2016		
	U.S. Elections - Expert		
	Testimony by J. Alex		
	Halderman Professor of		
	Computer Science,		
	University of Michigan		
	dated 06.21.2017		
30	Halderman Deposition	Deposition Exhibit	H; F; I;
	Exhibit 8 - Redacted		
	Report of the Select		
	Committee on		
	Intelligence United		
	States Senate on Russian		
	Active Measures		
	Campaigns and		
	Interference in the 2016		
	U.S. Election Volume 1:		
	Russian Efforts Against		
	Election Infrastructure		
91	with Additional Views.	Domosition Fulilit	LL. D. L.
31	Halderman Deposition	Deposition Exhibit	H; F; I;
	Exhibit 9 - New York		OW
	Times article, "I Hacked		
	an Election by J. Alex Halderman. So Can the		
	manuerman, so can the		

Exh	Document Description	Document Type	Objection
10 100	Russians" dated April 5, 2018		S
32	2020.08.26 Exhibit 5 (C-3) to Preliminary Injunction State Defendants' Response in Opposition to Curling Plaintiffs' Fourth Motion for Preliminary Injunction - Exhibit 3 - Part 3 of 3 - Deposition of J. Alex Halderman, Ph.D and (Exs. 10-15)	Compilation of Halderman Deposition Exhibits 10 through 15	H; F; M; C
33	Halderman Deposition Exhibit No. 10 - 2017.06.21 Article co- authored by Jay Halderman entitled "Here's how to keep Russian hackers from attacking the 2018 elections"	Deposition Exhibit	H; F; C;
34	Halderman Deposition Exhibit No. 11 - Medium.com online article entitled Want to Know if the Election was Hacked? Look at the Ballots authored by J. Alex Halderman	Deposition Exhibit	H; F; C;
35	Halderman Deposition Exhibit No. 12 alumnus.alumni.umrich. edu (University of Michigan) online article entitled Hacking the Vote: It's Easier Than You Thing by Steve	Deposition Exhibit	H; F; C; 104; PK; NR

Exh	Document Description	Document Type	Objection
it No			S
	Friess - Professor J. Alex		
	Halderman has made a		
	career studying		
	electronic voting		
	security		
36	Halderman Deposition	Deposition Exhibit	NR
	Exhibit No. 13 - U.S.		
	Patent No. 8,033,463B@		
	dated 10.11.2011 by		
	Felten for System and		
	Method for Machine-		
	Assited Election Auditing		
37	Verified Voting	Deposition Exhibit	H; F; C;
	Foundation article		104; PK;
	entitled Principles for		NR
	New Voting Systems		
	dated 02.01.2015		
38	Halderman Deposition	Deposition Exhibit	H; F; C
	Exhibit No. 15 - Undated		
	University of Michigan		
	article entitled "Can		
	Voters Detect Malicious		
	Manipulation of Ballot		
	Marking Devices?" co-		
	authored by J. Alex		
	Halderman		
39	Exhibit 6 (D) to	Declaration	H; F; NE
	RESPONSE in		
	Opposition re 785		
	MOTION for Preliminary		
	Injunction State		
	Defendants' Response in		
	Opposition to Curling		
	Plaintiffs' Fourth Motion		
	for Preliminary		
	Injunction -Declaration		
	of Jack Cobb		

Exh	Document Description	Document Type	Objection
it No			s
40	Exhibit 7 (E) to	Declaration	NE; H; F;
	RESPONSE in		M
	Opposition re 785		
	MOTION for Preliminary		
	Injunction State		
	Defendants' Response in		
	Opposition to Curling		
	Plaintiffs' Fourth Motion		
	for Preliminary		
	Injunction - Declaration		
	of Jaun		
	E. Gilbert, PH.D.		
41	Exhibit 8 (F) to	Declaration	NE; H; F;
	RESPONSE in		M
	Opposition re 785		
	MOTION for Preliminary		
	Injunction State		
	Defendants' Response in		
	Opposition to Curling		
	Plaintiffs' Fourth Motion		
	for Preliminary		
	Injunction - Declaration		
40	of Mark Riccobono	D 1 (NID II II
42	Exhibit 9 (G) to	Declaration	NE; H; F;
	RESPONSE in		NR
	Opposition re 785		
	MOTION for Preliminary		
	Injunction State		
	Defendants' Response in Opposition to Curling		
	Plaintiffs' Fourth Motion		
	for Preliminary		
	Injunction -		
	Supplemental		
	Declaration of Chris		
	Harvey		

	Document Description	Document Type	Objection
it No			S
43	Exhibit 1 (A) to	Declaration	NE; H; F;
	RESPONSE in		
	Opposition re 809		
	MOTION for Preliminary		
	Injunction on BMDs,		
	Scanning and		
	Tabulating, and Auditing		
	State Defendants'		
	Response in Opposition		
	to Coalition Plaintiffs'		
	Motion for Preliminary		
	Injunction Relating to		
	BMDs, Scanning and		
	Tabulating, and Auditing		
	- Supplemental		
	Declaration of		
	Dr. Eric Coomer		
44	Exhibit 2 (B) to	Declaration	NE; H; F
	RESPONSE in		
	Opposition re 809		
	MOTION for Preliminary		
	Injunction on BMDs,		
	Scanning and		
	Tabulating, and Auditing		
	State Defendants'		
	Response in Opposition		
	to Coalition Plaintiffs'		
	Motion for Preliminary		
	Injunction Relating to		
	BMDs, Scanning and		
	Tabulating, and Auditing		
	- Declaration of Dr.		
	Benjamin Adida		
45	Exhibit 3 (C) to	Declaration	NE; H; F;
	RESPONSE in		NR; M
	Opposition re 809		
	MOTION for Preliminary		
	Injunction on BMDs,		
	Scanning and		

Exh	Document Description	Document Type	Objection
it No			S
	Tabulating, and Auditing State Defendants' Response in Opposition to Coalition Plaintiffs' Motion for Preliminary Injunction Relating to BMDs, Scanning and Tabulating, and Auditing - Supplemental Declaration of Chris Harvey		
46	Exhibit 1 (A) to SURREPLY BRIEF re 785 MOTION for Preliminary Injunction State Defendants' Surreply in Opposition to Curling Plaintiffs' Fourth Preliminary Injunction Motion - Supplemental Declaration of Jack Cobb	Declaration	NE; H; F; 104; NR
47	Exhibit 2 (B) to SURREPLY BRIEF re 785 MOTION for Preliminary Injunction State Defendants' Surreply in Opposition to Curling Plaintiffs' Fourth Preliminary Injunction Motion - Supplemental Declaration of Chris Harvey	Declaration	NE; H; F; NR; 104
48	State Defendants' Notice of Filing Exhibits for September 14, 2020 Hearing on Motions for Preliminary Injunction	Pleading	NE; NR; H; F

	Document Description	Document Type	Objection
it No.	Exhibit 1 to State	Declaration	NE; H; F;
	Defendants' Notice of	Beclaration	111, 11, 1,
	Filing Exhibits for		
	September 14, 2020		
	Hearing on Motions for		
	Preliminary Injunction -		
	Declaration of Derrick		
50	Gilstrap Ershibit 2 to State	Article	H. E. DIZ.
50	Exhibit 2 to State Defendants' Notice of	Article	H; F; PK; 104; NR
	Filing Exhibits for		104, 111
	September 14, 2020		
	Hearing on Motions for		
	Preliminary Injunction -		
	Online article from		
	Savannah now entitled		
	"Recount results in:		
	Derek Mallow wins		
	Georgia House race by 19		
	votes authored by DeAnn		
51	Komanecky	Hooving Transcript	NE. H. E.
91	2019.07.25 Hearing Transcript on	Hearing Transcript	NE; H; F; C
	Preliminary Injunction		
	Proceedings before the		
	Hon. Amy Totenberg		
	Volume 1 of		
	2		
52	2019.07.26 Hearing	Hearing Transcript	NE; H; F;
	Transcript on		\mathbf{C}
	Preliminary Injunction		
	Proceedings before the		
	Hon. Amy Totenberg		
	Volume 2 of		
53	2020 00 10 Hooring	Hoaving Transcript	ME. H. E.
99	2020.09.10 Hearing Transcript on	Hearing Transcript	NE; H; F; C
	Preliminary Injunction		
	Proceedings before the		

Exh	Document Description	Document Type	Objection s
	Hon. Amy Totenberg Volume 1		
54	2020.09.11 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 2	Hearing Transcript	NE; H; F; C
55	2020.09.14 Hearing Transcript on Preliminary Injunction Proceedings before the Hon. Amy Totenberg Volume 3	Hearing Transcript	NE; H; F; C
56	Appel, Andrew 2022.01.07 Deposition Exhibit 1 - Notice of Deposition of Andrew W. Appel	Deposition Exhibit	NE; NR; F;
57	Appel, Andrew 2022.01.07 Deposition Exhibit 2 - Declaration of Andrew W.Appel in Support of Motion for Preliminary Injunction	Deposition Exhibit	NE; H; F; M
58	Appel, Andrew 2022.01.07 Deposition Exhibit 3 - Expert Review of Andrew W. Appel,	Deposition Exhibit	NE; H; F
59	Appel, Andrew 2022.01.07 Deposition Exhibit 4 - Declaration of Andrew W. Appel iso Mot for PI	Deposition Exhibit	NE; H; F
60	Appel, Andrew 2022.01.07 Deposition Exhibit 5 -	Deposition Exhibit	NE; H; F

Exh	Document Description	Document Type	Objection s
	Declaration of Andrew W. Appel iso Mot for PI		
61	Appel, Andrew 2022.01.07 Deposition Exhibit 6 - Declaration of Juan E. Gilbert, Ph.D	Deposition Exhibit	NE; H; F; M
62	Appel, Andrew 2022.01.07 Deposition Exhibit 7 - State Defs' Expert Disclosures - Reports	Deposition Exhibit	NE; NR; F; M; H
63	Appel, Andrew 2022.01.07 Deposition Exhibit 8 - Rebuttal Report of Andrew W. Appel, 07/30/21	Deposition Exhibit	NE; H; F
64	Appel, Andrew 2022.01.07 Deposition Exhibit 9 - Freedom to Tinker article entitle, Georgia's Election Certification Avoided an EvenWorse Nightmare That's Just Waiting to Happen Next Time	Deposition Exhibit	H; F; PK; A; 104; NR
65	Appel, Andrew 2022.01.07 Deposition Exhibit 10 - Freedom to Tinker article entitled, Did Sean Hannity misquote me?	Deposition Exhibit	H; F; PK; A; 104; NR
66	Appel, Andrew 2022.01.07 Deposition Exhibit 11 - Freedom to Tinker article entitled, Voting Machines I Recommend	Deposition Exhibit	H; F; PK; A; 104; NR

Exh	Document Description	Document Type	Objection
it No			S
67	Appel, Andrew 2022.01.07 Deposition Exhibit 12 - Document entitled Scientistssay no credible eidence ofcomputer fraud in the 2020 election outcome, but policy makers must work with experts to imporve confidence	Deposition Exhibit	H; F; A
68	Barnes, Michael 2019.06.27 Deposition Exhibit 20 - Defendants Secretary of State, State Election Board, and State Election Board Members' Response to Order Dated April 16, 2019	Deposition Exhibit	NE: H; F;
69	Barnes, Michael 2019.06.27 Deposition Exhibit 21 - E- mail with attachment to Milsteen from Marks, 10/11/17, Bates labeled CGG 1 - 190	Deposition Exhibit	M; H; F; Q
70	Barnes, Michael 2019.06.27 Deposition Exhibit 22 - Diebold Election Systems, Inc. 2005 GEMS 1.18 User's Guide, 12.4 Challenge Board	Deposition Exhibit	F; 104; I; NR; H
71	Barnes, Michael 2019.06.27 Deposition Exhibit 23 - Diebold Election Systems, Inc. 2005 GEMS 1.18 User's	Deposition Exhibit	F; 104; I; NR; H

	Document Description	Document Type	Objection
it No	C:1 22D14:		S
	Guide, 2.3 Deleting a Database		
	Database		
72	Barnes, Michael	Deposition Exhibit	NR; 104;
	2019.06.27 Deposition		F; A; H
	Exhibit 24 - Ballot		
	image printout from		
	GEMS computer		
73	Barnes, Michael	Deposition Exhibit	NR; A; F;
	2019.06.27 Deposition		H
	Exhibit 25 - Ballot		
	image report from a		
- 1	GEMS computer	D D 1 11.	ND 4 D
74	Barnes, Michael	Deposition Exhibit	NR; A; F;
	2019.06.27 Deposition Exhibit 26 -		H
	Handwritten page		
75	Barnes, Michael	Deposition Exhibit	NR; F; H
10	2019.06.27 Deposition	Deposition Exhibit	
	Exhibit 27 - Direct		
	Record Electronic Voting		
	Machine Recap records		
76	Barnes, Michael	Deposition Exhibit	OW; A; F;
	2019.06.27 Deposition		Q
	Exhibit 28 - Copy		
	of photograph		
77	Barnes, Michael	Deposition Exhibit	NE; H; F;
	2019.06.27 Deposition		
	Exhibit 29 - USA		
	vs. Netyksho, et al.		
70	Indictment	D	A . T2 . T1
78	Barnes, Michael	Deposition Exhibit	A; F; H
	2019.06.27 Deposition Exhibit 30 - Russian		
	Targeting of Election		
	Infrastructure During		
	the 2016 Election:		
	Summary of Initial		
	Findings and		

Exh	Document Description	Document Type	Objection s
	Recommendations, May 8, 2018		
79	Barnes, Michael 2019.06.27 Deposition Exhibit 31 - "Who, What, Why" article titled "Kemp's Aggressive Gambit to Distract from Election Security Crisis."	Deposition Exhibit	PK; H; F; 403
80	Barnes, Michael 2019.06.27 Deposition Exhibit 32 - Press release from the Secretary of State's office entitled, After Failed Hacking Attempt SOS Launches Investigation into Georgia Democratic Party	Deposition Exhibit	H; F;
81	Barnes, Michael 2022.02.11 Deposition Exhibit 1 - Curling Plaintiffs Third Amd NOD of Office of the Secretary of the State, no Bates Numbers	Deposition Exhibit	NE; H; F; NR
82	Barnes, Michael 2022.02.11 Deposition Exhibit 2 - Michael Barnes LinkedIn Profile - No Bates Numbers	Deposition Exhibit	H; F; 104; NR
83	Barnes, Michael 2022.02.11 Deposition Exhibit 3 - Michael Barnes LinkedIn Profile - No Bates Numbers	Deposition Exhibit	H; F; 104; NR

Exh	Document Description	Document Type	Objection
it No			S
84	Barnes, Michael 2022.02.11 Deposition Exhibit 4 - Email chain dated January 2020	Deposition Exhibit	H; F
85	Barnes, Michael 2022.02.11 Deposition Exhibit 5 - Email chain dated January 2020	Deposition Exhibit	H; F
86	Barnes, Michael 2022.02.11 Deposition Exhibit 6 - Email chain dated February 2020	Deposition Exhibit	H; F
87	Barnes, Michael 2022.02.11 Deposition Exhibit 7 - Email chain dated February 2020	Deposition Exhibit	H; F
88	Barnes, Michael 2022.02.11 Deposition Exhibit 8 - Email chain dated February 2020	Deposition Exhibit	H; F
89	Barnes, Michael 2022.02.11 Deposition Exhibit 9 - Email chain dated May 2020	Deposition Exhibit	H; F; PK;
90	Barnes, Michael 2022.02.11 Deposition Exhibit 10 - Email dated 06/01/2020 from Scott Tucker to Gabriel Sterling and others	Deposition Exhibit	H; F; PK; 104; NR
91	Barnes, Michael 2022.02.11 Deposition Exhibit 11 -	Deposition Exhibit	H; F; PK; 104; NR

	Document Description	Document Type	Objection
it No	Email dated 06/01/2020		S
	from Scott Tucker to		
	Gabriel Sterling and		
	others		
92	Barnes, Michael	Deposition Exhibit	H; F; 104;
02	2022.02.11 Deposition	Deposition Emiliate	PK; 104;
	Exhibit 12 - Email		NR
	dated 06/01/2020		
93	Barnes, Michael	Deposition Exhibit	H; F; 104;
	2022.02.11 Deposition		PK; 104;
	Exhibit 13 Email		NR
	chain dated 06/03/20 20		
94	Barnes, Michael	Deposition Exhibit	H; F; 104;
	2022.02.11 Deposition		PK; 104;
	Exhibit 14 - Email chain		NR
	dated 06/20/2020		
95	Barnes, Michael	Deposition Exhibit	H; F; PK;
	2022.02.11 Deposition		
	Exhibit 15 - Email		
	chain dated 06/20/2020		
96	Barnes, Michael	Deposition Exhibit	H; F; PK
	2022.02.11 Deposition		
	Exhibit 16 - Email chain		
0.7	dated 06/20/2020	D :: D 1:1:	II E DIZ
97	Barnes, Michael	Deposition Exhibit	H; F; PK
	2022.02.11 Deposition		
	Exhibit 17 - Email chain dated 06/20/2020		
98	Barnes, Michael	Deposition Exhibit	H; F; PK;
30	2022.02.11 Deposition	Deposition Eximate	11, 1, 1 11,
	Exhibit 18 - Email		
	chain dated 06/20/2020		
99	Barnes, Michael	Deposition Exhibit	H; F;
	2022.02.11 Deposition	r	,,
	Exhibit 19 - Email		
	dated 06/11/2020 fro		
	Cynthia Willingham to		
	Scott Tucker and Others		

Exh	Document Description	Document Type	Objection
it No			s
100	Barnes, Michael	Deposition Exhibit	H; F; PK
	2022.02.11 Deposition		
	Exhibit 20 -		
	Email chain dated		
	06/20/2020		
101	Barnes, Michael	Deposition Exhibit	H; F; PK
	2022.02.11 Deposition		
	Exhibit 21 - Email		
100	chain dated 06/20/2020	D D.I.I.	
102	Barnes, Michael	Deposition Exhibit	H; F;
	2022.02.11 Deposition		
	Exhibit 22- Email		
100	chain dated July 2020	D D.I.G.	
103	Barnes, Michael	Deposition Exhibit	H; F
	2022.02.11 Deposition		
	Exhibit 23 - Email		
104	chain dated August 2020	D D.I.I.	TT D
104	Barnes, Michael	Deposition Exhibit	H; F;
	2022.02.11 Deposition		
	Exhibit 24 -		
	Email chain dated		
105	August 2020	D D.1.1.	II D
105	Barnes, Michael	Deposition Exhibit	H; F
	2022.02.11 Deposition		
	Exhibit 25 -		
	Email chain dated		
100	September 2020	Denogition E-hibit	П. Б
106	Barnes, Michael	Deposition Exhibit	H; F
	2022.02.11 Deposition		
	Exhibit 26 - Email		
	chain dated September 2020		
107	Barron, Richard	Denogition Exhibit	H. F. MD
107	,	Deposition Exhibit	H; F; NR
	2022.01.31 Deposition Exhibit 1 - 1-18-		
	22, Curling Plaintiffs'		
	Third Amended Notice of		
	Deposition of Fulton		
	County Defendants re:		
	County Defendants re:		

Exh	Document Description	Document Type	Objection
it No		_ comment by P	s
	The		
	above-captioned action.		
108	Barron, Richard	Deposition Exhibit	H; F
	2022.01.31 Deposition		
	Exhibit 9 - 466, 9-29-20,		
	E-mail string from Scott Tucker to Blake Evans		
	re:Two ballots printing		
109	Barron, Richard	Deposition Exhibit	H; F; PK
	2022.01.31 Deposition		11, 1, 1
	Exhibit 10 - 06.09.2020 -		
	E-mail string from		
	Chris Harvey to Richard		
	Barron		
	16 re: Fulton County -		
	Machines Down and		
110	Polling Places Not Open. Barron, Richard	Deposition Exhibit	Unknown;
110	2022.01.31 Deposition	Deposition Exhibit	NR
	Exhibit 11 - Withdrawn		1110
	by counsel		
111	Barron, Richard	Deposition Exhibit	H; F; PK
	2022.01.31 Deposition		
	Exhibit 13 - 8-11- 20, E-		
	mail string from		
	Blake Evans to Richard		
	Barron, Dwight Brower,		
	Sharon Benjamin and Johnny Harris re:		
	Elections complaint from		
	Thomas Elliott.		
112	Barron, Richard	Deposition Exhibit	H; F; PK
	2022.01.31 Deposition	_	
	Exhibit 19 - 9-10- 20, E-		
	mail string from		
	Richard Barron to		
	Brigitte Bailey, Gabriel		

Exh	Document Description	Document Type	Objection s
	Sterling and Dwight Brower re: Fulton AdvanceVoting Issue.		
113	Barron, Richard 2022.01.31 Deposition Exhibit 25 - PowerPoint re: Fulton Election Day Issues	Deposition Exhibit	H; F; PK
114	Barron, Richard 2022.01.31 Deposition Exhibit 26 - 06.09.2020 E-mail string from Ryan German to Frances Watson and ChrisHarvey re: Polling Machine Issue	Deposition Exhibit	H; F; PK
115	Barron, Richard 2022.01.31 Deposition Exhibit 27 - 07.16.2020 E-mail string from Richard Barron to Julie Houk and Ryan Germany re: Urgent demands 10 to send corrected absentee ballots to Fulton Co. Voters	Deposition Exhibit	H; F; PK
116	Barron, Richard 2022.01.31 Deposition Exhibit 31 - 12-14- 18, E- mail from Richard Barron to list re: Voting system input from Fulton County, and 1-3-19 E- mail from Joseph Kirk to list re: My thoughts about our next voting system.	Deposition Exhibit	H; F
117	Barron, Richard 2022.01.31 Deposition	Deposition Exhibit	Unknown; NR

Exh	_	Document Type	Objection s
-	Exhibit 32 (Exhibit Withdrawn by counsel)		
118	Barron, Richard 2022.01.31 Deposition Exhibit 33 - 09.17.19 Email string from Gabriel Sterling to Chris harvey re: Fulton County ExpressPolls	Deposition Exhibit	H; F
119	Barron, Richard 2022.01.31 Deposition Exhibit 34 - 11.02.2020, Seven Hills Strategies report re: State Election Board	Deposition Exhibit	H; F; PK
120	Barron, Richard 2022.01.31 Deposition Exhibit 35 - 01.12.2021 Seven Hills Strategies reort re: State Election Board - Post Election Executive Summary	Deposition Exhibit	H; F; PK
121	Beaver, Merritt 2022.02.22 Deposition Exhibit 1 - Curling Plaintiffs'Second AMD NOD of the Office of the Secretary of State	Deposition Exhibit	NE; H; F
122	Beaver, Merritt 2022.02.22 Deposition Exhibit 2 - Declaration of Merritt Beaver	Deposition Exhibit	NE; H; F; C
123	Beaver, Merritt 2022.02.22 Deposition Exhibit 3 - Declaration of S. Merritt Beaver	Deposition Exhibit	NE; H; F; C

Exh	Document Description	Document Type	Objection
it No			S
124	Beaver, Merritt 2022.02.22 Deposition Exhibit 4 - LinkedIn Printout of Merritt Beaver's profile page	Deposition Exhibit	H; F
125	Beaver, Merritt 2022.02.22 Deposition Exhibit 5 - AJC article entitled Case files discredit Kemp's accusation that democrats tried to hack Georgia election	Deposition Exhibit	PK; H; F
126	Beaver, Merritt 2022.02.22 Deposition Exhibit 6 - 07.01.2020 email string the with top from Kevin Robertson	Deposition Exhibit	H; F
127	Beaver, Merritt 2022.02.22 Deposition Exhibit 7 - Email string dated 12/02/2020 with the top from Kay Stinson	Deposition Exhibit	H; F
128	Beaver, Merritt 2022.02.22 Deposition Exhibit 8 - ImageCast X ballot marking device document	Deposition Exhibit	NE; H; F
129	Beaver, Merritt 2022.02.22 Deposition Exhibit 9 - Document entitled Information Technology Security Program Charter	Deposition Exhibit	A; H; F

Exh	Document Description	Document Type	Objection
130	Beaver, Merritt 2022.02.22 Deposition Exhibit 10 - Document dated 07.14.2020 entitled Fortalice Solutions Web Vulnerability Remediation Checks Secretary of State Georgia draft	Deposition Exhibit	A; H; F; 104; NR
131	Beaver, Merritt 2022.02.22 Deposition Exhibit 11 - 07.10.2020 Email string with the top from Dave Hamilton	Deposition Exhibit	H; F
132	Beaver, Merritt 2022.02.22 Deposition Exhibit 12 - E-mail string with the top from Chris Furtick dated 11.02.2020	Deposition Exhibit	H; F; PK
133	Beaver, Merritt 2022.02.22 Deposition Exhibit 13 - 04.05.2019 email string with the top from Kevin Rayburn	Deposition Exhibit	H; F; C
134	Beaver, Merritt 2022.02.22 Deposition Exhibit 14 - 2019.04.03 Emal string with the top from Josh Hood	Deposition Exhibit	H; F; 104; NR
135	Beaver, Merritt 2022.02.22 Deposition Exhibit 15 - 08.13.2020 email string with the top from Dave Hamilton	Deposition Exhibit	H; F;
136	Beaver, Merritt 2022.02.22 Deposition Exhibit 16 -	Deposition Exhibit	H; F

	Document Description	Document Type	Objection
it No			S
	12.30.2020 Email string		
	with the top from Chris		
	Harvey		
137	Beaver, Merritt	Deposition Exhibit	H; F
	2022.02.22 Deposition		
	Exhibit 17 - 12.21.2020		
	E-mail string with the		
	top from Dave Hamilton		
138	Beaver, Merritt	Deposition Exhibit	H; F;
	2022.02.22 Deposition		
	Exhibit 18 - 2020		
	Security of the voter		
	registration system		
	artifacts and		
	attestation pursuan to		
	Rule 590-8-3-01		
139	Beaver, Merritt	Deposition Exhibit	H; F;
	2022.02.22 Deposition	_	
	Exhibit 19 -		
	08.21.2020 Email from		
	Dave Hamilton		
140	Beaver, Merritt	Deposition Exhibit	M; H; F
	2022.02.22 Deposition		
	Exhibit 20 - 12.31.2020		
	Email string with the top		
	from Angelos Keromytis		
141	Beaver, Merritt	Deposition Exhibit	H; F; 104;
	2022.02.22 Deposition		NR
	Exhibit 21 -		
	09.17.2020 Email string		
	with the top from Terry		
	Jones		
142	Beaver, Merritt	Deposition Exhibit	H; F; 104;
	2022.02.22 Deposition		NR
	Exhibit 22 -		
	Document entitled		
	Fortalice Rules of		
	Enagement of Georgia		

	Document Description	Document Type	Objection
it No	Secretary of State		S
	Memorandum		
	Memorandum		
143	Beaver, Merritt	Deposition Exhibit	H; F
	2022.03.10 Deposition		
	Exhibit 23 - 07.29.2020		
	Email striing with the		
	top from Dave Hamilton		
144	Beaver, Merritt	Deposition Exhibit	H; F
	2022.02.22 Deposition		
	Exhibit 24 - 11.12.2020		
	Email string with the top		
145	from Merritt Beaver Beaver, Merritt	Deposition Exhibit	H; F
140	2022.02.22 Deposition	Deposition Eximit	11, 1
	Exhibit 25 -		
	11.03.2020 email Email		
	from Jason Matthews		
146	Beaver, Merritt	Deposition Exhibit	H; F
	2022.03.10 Deposition	_	
	Exhibit 26 -		
	08.14.2020 Email string		
	with the top from Kevin		
	Robertson		
147	Beaver, Merritt	Deposition Exhibit	H; F
	2022.02.22 Deposition		
	Exhibit 27 - 03.03.2019		
	Email string with the top from Merritt Beaver		
148		Deposition Exhibit	Ц. F. 104
140	Beaver, Merritt 2022.02.22 Deposition	Dehosinon ramon	H; F; 104
	Exhibit 28 -		
	08.14.2020 Email from		
	Nick Salsman		
149	Beaver, Merritt	Deposition Exhibit	A; H; F
	2022.02.22 Deposition	_	PK; 104;
	Exhibit 29 -		NR
	2020.06.15 Document		

	Document Description	Document Type	Objection
it No			S
	entitled Election Office		
	Notes		
150	Beaver, Merritt	Deposition Exhibit	A; H; F; I;
	2022.03.10 Deposition		104; NR
	Exhibit 1 - 2020.05.19		
	Fortalice Solutions		
	Technical Assessment		
	Prepard for Secretary of		
	State Georgia DRAFT	B 111	
151	Beaver, Merritt	Deposition Exhibit	A; H; F; I;
	2022.03.10 Deposition		104; NR
	Exhibit 2 - 2020.07.09		
	Fortalice Solutions		
	Firmware Comparison		
	and Configuration		
	Analysis, Secretary of		
	Sate Georgia,		
150	DRAFT	Danasitian Enhibit	A. II. T. I.
152	Beaver, Merritt	Deposition Exhibit	A; H; F; I;
	2022.03.10 Deposition Exhibit 3 - 08.25.2020		
	Fortalice Solutions		
	Technical Assessment		
	Prepared for Secretary of		
	State Georgia, DRAFT		
153	Beaver, Merritt	Deposition Exhibit	A; H; F; I;
199	2022.03.10 Deposition	Deposition Eximit	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	Exhibit 4 -		
	08.25.2020 Fortalice		
	Solutions Technical		
	Assessment Prepared for		
	Secretary of State		
	Georgia, DRAFT		
154	Beaver, Merritt	Deposition Exhibit	A; H; F; I;
	2022.03.10 Deposition	•	
	Exhibit 5 - 08.25.2020		
	Fortalice Solutions		
	Technical Assessment		

	Document Description	Document Type	Objection
it No			S
	Prepared for Secretary of		
	State Georgia, DRAFT		
155	Beaver, Merritt	Deposition Exhibit	A; H; F; Q;
	2022.03.10 Deposition	1	, , , ,
	Exhibit 7 -		
	11.25.2020 Secretary of		
	State Georgia, Fulton		
	County Laptop Forensic		
	Review		
156	Beaver, Merritt	Deposition Exhibit	H; F;
	2022.03.10 Deposition		
	Exhibit 8 - Email		
	string		
157	Beaver, Merritt	Deposition Exhibit	H; F; C
	2022.03.10 Deposition		
	Exhibit 9 - Email		
	String		
158	Beaver, Merritt	Deposition Exhibit	NE; H; F;
	2022.03.10 Deposition		\mathbf{C}
	Exhibit 10 - 07.01.2021		
	Security Analysis of		
	Georgia's ImageCast X		
	Ballot Marking Devices,		
	Expert Report Submitted on Behalf of Plaintiffs		
	Donna		
	Curling, et al., authored		
	by Prof.J. Alex		
	Halderman, Ph.D. with		
	theassistance of Prof.		
	Drew Springall, Ph.D.		
159	Beaver, Merritt	Deposition Exhibit	NE; H; F;
	2022.03.10 Deposition		NR
	Exhibit 11 - Curling		
	Plaintiffs' Fifth AMD		
	NOC of Office of the		
	Secretary of State		

Exh	Document Description	Document Type	Objection
it No	-	•	s
160	Beaver, Merritt	Deposition Exhibit	OW; H; F
	2022.03.10 Deposition		
	Exhibit 12 - CGG		
	Recording		
161	Beaver, Merritt	Deposition Exhibit	H; F; 104;
	2022.03.10 Deposition		NR
	Exhibit 13 - 11.17.2020		
	Official Election Bulletin,		
	dated November 17,		
	2020, from Chris Harvey,		
	Elections		
	DivisionDirector, to		
	County Election Officials		
	and County Registrars		
	RE: Open Records		
	Requests - Security		
100	Information Exempt	7.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1	\
162	Coalition for Good	Deposition Exhibit	NE; H; F;
	Governance through		NR
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Exhibit 1 -		
1.00	Notice of Deposition	D D 1 1 1	ND 101
163	Coalition for Good	Deposition Exhibit	NE; 104;
	Governance through		F; NR; H
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 2 -		
104	Objections to NOD	D	NID D II
164	Coalition for Good	Deposition Exhibit	NE; F; H
	Governance through		
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 3 - Plaintiffs'		
	Third AMD Complaint		

Exh	Document Description	Document Type	Objection s
165	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 4 - First Supplemental Complaint of Plaintiffs Coalition for Good Governance, Laura Digges, William Digges III, Ricardo Davis, and Megan Missett	Deposition Exhibit	NE; F; H
166	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 5 - Supplemental Declaration of Marilyn Marks	Deposition Exhibit	NE; F; M; H
167	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 6 - 2017 Form 990-EZ	Deposition Exhibit	NR
168	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 7 - 2018 Form 990	Deposition Exhibit	NR
169	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6)	Deposition Exhibit	NR

Exh	Document Description	Document Type	Objection s
10111	Deposition- Deposition Exhibit 8 - 2019 Form 990		2
170	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 9 - Plaintiffs' Notice of Filing Declaration	Deposition Exhibit	NE; M; H; F; NR
171	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 10 - Coalition Plaintiffs' Detailed Specification In Support of Motion for Attorneys' Fees	Deposition Exhibit	NE; NR
172	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 11 - New York correspondence from January 2021 citing Curling	Deposition Exhibit	403; C; NR
173	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 12 - NCSBOE letter from 2019	Deposition Exhibit	403; C; NR

Governance through	; C; NR
Governance through	; C; NK
Marilyn Marks -	
2022.03.17 30(b)(6) Denogition Denogition	
Deposition- Deposition Exhibit 13 - E-mails,	
9/26/19,	
GGG2021001277506	
175 Coalition for Good Deposition Exhibit	
Governance through	
Marilyn Marks -	
2022.03.17 30(b)(6)	
Deposition- Deposition	
Exhibit 14 - 3/4/21 letter	
from CGG to	
Georgia Republican	
Leaders	
176 Coalition for Good Deposition Exhibit	
Governance through	
Marilyn Marks -	
2022.03.17 30(b)(6)	
Deposition Deposition	
Exhibit 15 -	
Mission Statement -	
Coalition	
for Good Governance	
177 Coalition for Good Deposition Exhibit	
Governance through	
Marilyn Marks -	
2022.03.17 30(b)(6)	
Deposition- Deposition	
Exhibit 16 -	
Articles of Incorporation for	
a Nonprofit Corporation 178 Coalition for Good Deposition Exhibit	
Governance through	
Marilyn Marks -	
2022.03.17 30(b)(6)	

	Document Description	Document Type	Objection
it No			S
	Deposition Deposition		
	Exhibit 17 - Who We Are		
	- Coalition for		
150	Good Governance	D D.I.I.	7.6 N.D. 11
179	Coalition for Good	Deposition Exhibit	M; NE; H;
	Governance through		F; 104; NR
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 18 - CGG Board		
100	Discussion Package	D B.1.1	104 7
180	Coalition for Good	Deposition Exhibit	104; F;
	Governance through		403; C; NR
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 19 -		
	Fundraising message	D B.1.1	104 7
181	Coalition for Good	Deposition Exhibit	104; F;
	Governance through		403; C; NR
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 20 - Fundraising		
100	message during 2020	D ::: E 1:1::	104 F
182	Coalition for Good	Deposition Exhibit	104; F;
	Governance through		403; C; NR
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 21 - Donate -		
	Coalition for Good		
100	Governance	D :: E l ::	104 E
183	Coalition for Good	Deposition Exhibit	104; F;
	Governance through		403; C; NR
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 22 -		

Exh	Document Description	Document Type	Objection s
	Home page - Coalition for GoodGovernance		~
184	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 23 - Current Projects - Coalition for Good Governance	Deposition Exhibit	104; F; 403; C; NR
185	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 24 - Tweets from January 24, 2021	Deposition Exhibit	104; F; 403; C; NR
186	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 25 - 8/22/20 tweet	Deposition Exhibit	104; F; 403; C; NR
187	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6) Deposition- Deposition Exhibit 26 - E-mails, 1/18/18 CGG2021001278172	Deposition Exhibit	F
188	Coalition for Good Governance through Marilyn Marks - 2022.03.17 30(b)(6)	Deposition Exhibit	F; NE

	Document Description	Document Type	Objection
it No			S
	Deposition Deposition		
	Exhibit 27 -		
	Supplemental Response		
100	to Rog 12	Danasitian Enhibit	D. ND
189	Coalition for Good	Deposition Exhibit	F; NE
	Governance through		
	Marilyn Marks -		
	2022.03.17 30(b)(6) Deposition- Deposition		
	Exhibit 28 - Coalition		
	Plaintiffs'Responses to		
	Defendant Anh Le's First		
	Interrogatories		
190	Coalition for Good	Deposition Exhibit	NR; H; F;
	Governance through		OW , II, II,
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition- Deposition		
	Exhibit 29 -		
	Joint Litigation and		
	Common Interest		
	Agreement		
191	Coalition for Good	Deposition Exhibit	NR; A; H;
	Governance through		F; PK
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 30 - Facebook		
	advertisement from		
	Friends of Coalition for Good		
	Good Governance		
192	Coalition for Good	Deposition Exhibit	NR; 403;
194	Governance through	Deposition Eximit	Nn, 405, F; H
	Marilyn Marks -		. ,
	2022.03.17 30(b)(6)		
	Deposition- Deposition		
	Exhibit 31 -		
	E-mail regarding ballot		

	Document Description	Document Type	Objection
it No			S
	image legislation		
	legisiation		
193	Coalition for Good	Deposition Exhibit	NR; 403; F
	Governance through		
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition- Deposition		
	Exhibit 32 - E- mails,		
	8/24/21, Subject:		
	Garland's new lawsuit		
	against BMDs		
194	Coalition for Good	Deposition Exhibit	403; F
	Governance through		
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition- Deposition		
	Exhibit 33 - January 1,		
	2021 tweet		
195	Coalition for Good	Deposition Exhibit	NE
	Governance through		
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 34 - Coalition for		
	Good		
	Governance's and		
	Coalition Plaintiffs'		
	Objections and		
	Responses to Defendant		
	Brad Raffensperger's		
	First Request for		
100	Admission	D 5.1.0	A DII
196	Coalition for Good	Deposition Exhibit	A; PK;
	Governance through		OW; H; F;
	Marilyn Marks -		403
	2022.03.17 30(b)(6)		
	Deposition- Deposition		

Exh it No	Document Description	Document Type	Objection s
	Exhibit 35 - 12.30.2020		
	GA Senate Judiciary		
	Sub-Committee on		
10=	Election Law	B 1.1	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
197	Coalition for Good	Deposition Exhibit	NE
	Governance through		
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 36 - Plaintiff		
	Coalition for Good		
	Governance's Objections		
	and Responses to State		
	Defendants' Second		
	Request for Production of		
100	Documents Coalition for Coal	Danagition Fubilit	NE
198	Coalition for Good	Deposition Exhibit	NE
	Governance through		
	Marilyn Marks - 2022.03.17 30(b)(6)		
	Deposition Deposition		
	Exhibit 37 - Response of		
	Coalition for Good		
	Governance to Brad		
	Raffensperger's First		
199	Coalition for Good	Deposition Exhibit	A; F; H
100	Governance through	S oposition Emissio	11, 1 , 11
	Marilyn Marks -		
	2022.03.17 30(b)(6)		
	Deposition- Deposition		
	Exhibit 38 -		
	Handwritten notes		
200	2021.09.28 Deposition of	Deposition Exhibit	NE; H; F;
	Megan Missett -		NR
	Deposition		
	Exhibit 1 - Notice of		
	Deposition		
201	2021.09.28 Deposition of	Deposition Exhibit	403; 104;
	Megan Missett -		F; NR

	Document Description	Document Type	Objection
it No			S
	Deposition Exhibit 2 - Ms. Missett's Voting		
	Record		
202	2021.09.28 Deposition of	Deposition Exhibit	NE; H; F
202	Megan Missett -	Deposition Exhibit	1N12, 11, I
	Deposition		
	Exhibit 3 - Declaration of		
	Megan Missett, 10/20/19		
203	2021.09.28 Deposition of	Deposition Exhibit	NE; H; F
200	Megan Missett -	Deposition Exhibit	1112, 11, 1
	Deposition Exhibit 4 -		
	Declaration of Megan		
	Missett, 5/21/19		
204	2022.01.17 Deposition of	Deposition Exhibit	104; H; F;
_01	James Oliver -	B oposition Emissio	NR
	Deposition		1110
	Exhibit 1 - Organization		
	Chart		
205	2022.01.17 Deposition of	Deposition Exhibit	104; H; F;
	James Oliver -		NR
	Deposition		
	Exhibit 2 - LinkedIn		
	Profile of james Oliver		
206	2022.01.17 Deposition of	Deposition Exhibit	OW; H; F
	James Oliver -		
	Deposition		
	Exhibit 3 - Fortalice Task		
	Order dated 3/11/21		
207	2022.01.17 Deposition of	Deposition Exhibit	H; F
	James Oliver -		
	Deposition		
	Exhibit 4 - Email Chain		
	dated October 2018		
208	2022.01.17 Deposition of	Deposition Exhibit	H; F;
	James Oliver -		
	Deposition		
	Exhibit 5 - Email Chain		
	dated August 2016		

Exh	Document Description	Document Type	Objection
it No			s
209	2022.01.17 Deposition of	Deposition Exhibit	NE
	James Oliver -		
	Deposition		
	Exhibit 6 - 2020 Rule		
	590-8.3 Attestation		
210	2022.01.17 Deposition of	Deposition Exhibit	H; F; C
	James Oliver -		
	Deposition Exhibit 7 -		
	Email Chain dated April		
211	2019	Deposition Exhibit	104. Ц. Г.
211	2022.01.17 Deposition of James Oliver -	Deposition Exhibit	104; H; F; NR
	Deposition		INIU
	Exhibit 8 - Email Chain		
	dated October 2019		
212	2022.01.17 Deposition of	Deposition Exhibit	104; H; F;
	James Oliver -		NR
	Deposition Exhibit 9 -		
	Email Chain dated July		
	2019		
213	2022.01.17 Deposition of	Deposition Exhibit	104; H; F;
	James Oliver -		NR
	Deposition		
	Exhibit 10 - Email Chain		
	dated April 2019		
214	2022.01.17 Deposition of	Deposition Exhibit	H; F
	James Oliver -		
	Deposition Exhibit 11 - Email dated		
	4/24/19		
215	2022.01.17 Deposition of	Deposition Exhibit	H; F
210	James Oliver -	Deposition Eximit	11, 1
	Deposition		
	Exhibit 12 - Email Chain		
	dated April 2019		
216	2022.01.21 Deposition of	Deposition Exhibit	NE; NR
	Dominic Olomo -	•	, -
	Deposition		
	Exhibit 1 - Curling		

	Document Description	Document Type	Objection
it No	DI		S
	Plaintinff's Third		
	Amended Notice of		
	Deposition of Fulton		
	County Defendants		
217	2022.01.21 Deposition of	Deposition Exhibit	H; F
	Dominic Olomo -		
	Deposition		
	Exhibit 2 - Email string		
	to Tucker from evans		
	9/29/20		
218	2022.01.21 Deposition of	Deposition Exhibit	H;F
	Dominic Olomo -		
	Deposition		
	Exhibit 3 - Email to		
	Harvey from Spell-		
	Forlwer 10/27/20		
219	2022.03.08 Deposition of	Deposition Exhibit	NE; H: F;
	Donna Price - Exhibit 1 -		NR
	Notice		
	of Deposition		
220	2022.03.08 Deposition of	Deposition Exhibit	104; H; F;
	Donna Price - Exhibit 2 -		PK; NR
	Georgians for Verified		
	Voting		
221	2022.03.08 Deposition of	Deposition Exhibit	403; F
	Donna Price - Exhibit 3 -		
	Voter		
	History File		
222	2022.03.08 Deposition of	Deposition Exhibit	NE; H; F
	Donna Price - Exhibit 4 -		
	Third Amended		
	Complaint		
223	2022.03.08 Deposition of	Deposition Exhibit	NE; H; F
	Donna Price - Exhibit 6 -		
	Delcaration dated		
	8/17/18		
224	2022.03.08 Deposition of	Deposition Exhibit	NE; H; F
	Donna Price - Exhibit 7 -	_	,

Exh it No	Document Description	Document Type	Objection s
	Declaration dated 5/29/18		
225	2022.03.08 Deposition of Donna Price - Exhibit 8 - Declaration dated 10/4/19	Deposition Exhibit	NE; H; F
226	2022.03.08 Deposition of Donna Price - Exhibit 10 - Declaration dated 8/19/20	Deposition Exhibit	NE; H; F
227	2022.03.08 Deposition of Donna Price - Exhibit 11 - Declaration dated 2/12/21	Deposition Exhibit	NE; H; F
228	2022.03.08 Deposition of Donna Price - Exhibit 12 - Absentee Ballot Report	Deposition Exhibit	A; F;
229	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 1 - DouglasNow news article, Re: Hampton & Ridlehoover resignation	Deposition Exhibit	H; F; PK; A
230	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 2 - Ridlehoover subpoena	Deposition Exhibit	NE
231	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 3 - Jil Screenshot at 5.19 of Video 2	Deposition Exhibit	A, F, H, OW
232	2022.08.16 Deposition of Jil Ridlehoover - Exhibit 4 - Dominion Voting Machine Flaws 2020	Deposition Exhibit	A, F, H,

	Document Description	Document Type	Objection
it No	El .: C .ee		S
	Election Coffee		
	County		
233	2022.08.16 Deposition of	Deposition Exhibit	F, NR,
	Jil Ridlehoover - Exhibit		OW, I
	5 -		
	Screenshot 2 (sportcoat)		
234	2022.08.16 Deposition of	Deposition Exhibit	F, NR,
	Jil Ridlehoover - Exhibit		OW, I
	6 -		
	Screenshot of Scott Hall		
235	2022.08.16 Deposition of	Deposition Exhibit	F, NR,
	Jil Ridlehoover - Exhibit		OW, I
	7 - C 1 - C 1 - C		
	Screenshot of Jennifer		
996	Jackson	Denosition Exhibit	E ND
236	2022.08.16 Deposition of Jil Ridlehoover - Exhibit	Deposition Exhibit	F, NR, OW, I
	8 - Screenshot of Paul		OW, I
	Maggio		
237	2022.08.16 Deposition of	Deposition Exhibit	F, NR,
	Jil Ridlehoover - Exhibit	- or section —	OW, I
	9 -		,
	Screenshot of Doug		
	Logan		
238	2022.08.16 Deposition of	Deposition Exhibit	F, NR,
	Jil Ridlehoover - Exhibit		OW, I
	10 - Screenshot of Greg		
	Freemyer		
239	2022.08.16 Deposition of	Deposition Exhibit	F, NR,
	Jil Ridlehoover - Exhibit		OW, I
	11 -		
	Screenshot of Russ		
240	Ramsland	Donogition Exhibit	F ND
<u>440</u>	2022.08.16 Deposition of Jil Ridlehoover - Exhibit	Deposition Exhibit	F, NR, OW, I
	12 -		O VV , 1
	Screenshot of Jeffrey		
	Lenberg		
	nemera		

	Document Description	Document Type	Objection
it No. 241	2022.08.16 Deposition of	Deposition Exhibit	F, NR,
	Jil Ridlehoover - Exhibit	Deposition Limit	OW, I
	13 -		,
	Screenshot 3		
242	2022.08.16 Deposition of	Deposition Exhibit	F, H,
	Jil Ridlehoover - Exhibit		
	14 -		
	Email string from Frances Watson to		
	Pamela Jones, dated May		
	11, 2021		
243	2022.08.16 Deposition of	Deposition Exhibit	F, H,
	Jil Ridlehoover - Exhibit		, ,
	15 -		
	Election Database Memo		
	re: Passwords		
244	2022.08.16 Deposition of	Deposition Exhibit	F, H, I
	Jil Ridlehoover - Exhibit		
	16 - Misty Hampton		
	Misty Hampton Messages with Eric		
	Chaney		
245	2022.08.16 Deposition of	Deposition Exhibit	F, H, I
	Jil Ridlehoover - Exhibit		
	17 -		
	Text Messages		
246	2022.08.16 Deposition of	Deposition Exhibit	F, H
	Jil Ridlehoover - Exhibit		
	18 - Texts Reveal GOP Mission to Breach Voting		
	Mission to Breach Voting Machine in		
	Georgia - Daily Beast		
247	2021.10.19 Deposition of	Deposition Exhibit	H, F, NE,
	Jeffrey Schoenberg -	_	NR
	Exhibit 1 -		
	Notice of Deposition		
248	2021.10.19 Deposition of	Deposition Exhibit	H, F, NE
	Jeffrey Schoenberg -		

	Document Description	Document Type	Objection
it No	E 1314 0		S
	Exhibit 2 -		
0.40	Verified Complaint	D :: E 1:1::	II D MD
249	2021.10.19 Deposition of	Deposition Exhibit	H, F, NE
	Jeffrey Schoenberg -		
	Exhibit 3 -		
	Verified Amended		
0.20	Complaint	D D.1.1.	II D MD
250	2021.10.19 Deposition of	Deposition Exhibit	H, F, NE
	Jeffrey Schoenberg -		
	Exhibit 4 -		
	Second Amended		
071	Complaint	D D.1.1.	II D MD
251	2021.10.19 Deposition of	Deposition Exhibit	H, F, NE
	Jeffrey Schoenberg -		
	Exhibit 5 -		
	Third Amended		
0.20	Complaint	D D.1.1.	II D MD
252	2021.10.19 Deposition of	Deposition Exhibit	H, F, NR
	Jeffrey Schoenberg -		
	Exhibit 6 -		
0.20	ENET Report	D D.1.1.	II D ND
253	2021.10.19 Deposition of	Deposition Exhibit	H, F, NR
	Jeffrey Schoenberg -		
	Exhibit 7 -		
0 T 4	Absentee Ballot Report	D D.1.1.	II D MD
254	2021.10.19 Deposition of	Deposition Exhibit	H, F, NR
	Jeffrey Schoenberg -		
	Exhibit 8 - " An Update		
	on Georgia's Election		
	Integrity Lawsuit"		
077	10/11/19	D D.1.1.	II D MD
255	2021.10.19 Deposition of	Deposition Exhibit	H, F, NR
	Jeffrey Schoenberg -		
	Exhibit 9 - "Daniel		
	Blackman Named EC		
	Chair of Sierra Club,		
050	Georgia Chapter"	Demonition E-1:1:1:4	H E NE
256	2021.10.19 Deposition of	Deposition Exhibit	H, F, NE
	Jeffrey Schoenberg -		

Exh	Document Description	Document Type	Objection
it No			S
	Exhibit 10 -		
	Declaration 8/19/20		
257	2021.10.19 Deposition of	Deposition Exhibit	H, F, NE
	Jeffrey Schoenberg -		
	Exhibit 11 -		
	Declaration 8/7/18		
258	2021.10.19 Deposition of	Deposition Exhibit	H, F
	Jeffrey Schoenberg -		
	Exhibit 12 -		
	Email Chain		
259	2019.07.19 Deposition of	Deposition Exhibit	H, F, NE
	Michael Ian Shamos -		
	Plaintiffs		
	Exhibit 73 - Declaration		
200	of Michael Shamos	D D.1.1.	TT 70
260	2019.07.19 Deposition of	Deposition Exhibit	H, F
	Michael Ian Shamos -		
	Plaintiffs Exhibit 74 -		
	Powerpoint entitled,		
	Cybersecurity Considerations for		
	Voting Systems, Wenke Lee, Ph.D.		
261	2019.07.19 Deposition of	Deposition Exhibit	H, F
201	Michael Ian Shamos -	Deposition Lamoit	11, 1
	Plaintiffs Exhibit 75 -		
	Cloudbust Security		
	document entitled, Office		
	of the Georgia Secretary		
	of State Cyber Risk		
	Assessment		
	October 2017		
262	2019.07.19 Deposition of	Deposition Exhibit	H, F
	Michael Ian Shamos -		
	Plaintiffs		
	Exhibit 76 - Fortalice		
	document		

Exh	Document Description	Document Type	Objection
it No			s
263	2019.07.19 Deposition of	Deposition Exhibit	H, F, NP
	Michael Ian Shamos -		
	Plaintiffs Exhibit 77 -		
	Diebold in the News - A		
	Partial List of		
	Documented Failures		
264	2022.09.28 Deposition of	Deposition Exhibit	H, F, NP, I
	Robert Sinners - Exhibit		
	1 -		
	LinkedIn Profile		
265	2022.09.28 Deposition of	Deposition Exhibit	H, F, M
	Robert Sinners - Exhibit		
	2 -		
	08122022-000034		
	through 08122022-		
	000053		
266	2022.09.28 Deposition of	Deposition Exhibit	H, F
	Robert Sinners - Exhibit		
	3 -		
	08122022-000110		
	through 08122022-		
	000122		
267	2022.09.28 Deposition of	Deposition Exhibit	H, F
	Robert Sinners - Exhibit		
	4 -		
	08122022-000162		
	through 08122022-		
000	000174	D '' E 1 1 2	II E
268	2022.09.28 Deposition of	Deposition Exhibit	H, F
	Robert Sinners - Exhibit		
	5 - E- mail thread, Harry		
	MacDougald, dated		
000	November 10, 2020	Deposition E-likit	
269	2022.09.28 Deposition of	Deposition Exhibit	H, F, M
	Robert Sinners - Exhibit		
	6 - Email thread from		
	Harry MacDougald,		
	dated November		
	10, 2020		

	Document Description	Document Type	Objection
it No			S
270	2022.09.28 Deposition of	Deposition Exhibit	H, F, IS, I
	Robert Sinners - Exhibit		
	7 - Excerpt of Misty		
	Hampton's messages		
271	2022.09.28 Deposition of	Deposition Exhibit	H, F
	Robert Sinners - Exhibit		
	8 - E-		
	mail from Eric Chaney,		
	November 11, 2020		
272	2022.09.28 Deposition of	Deposition Exhibit	H, F
	Robert Sinners - Exhibit		
	9 - E- mail thread, Tracie		
	Vickers, December 3,		
	2020		
273	2022.09.28 Deposition of	Deposition Exhibit	H, F
	Robert Sinners - Exhibit		
	10 - E-		
	mail thread, David		
	Shafer, November 20,		
0=1	2020	D D.1.1.	
274	2022.09.28 Deposition of	Deposition Exhibit	H, F, I
	Robert Sinners - Exhibit		
	11 -		
	November 11, 2020 letter		
055	to Brad Raffensperger	D :: Blile	II I
275	2022.09.28 Deposition of	Deposition Exhibit	H, F, M
	Robert Sinners - Exhibit		
	12 - Email Thread to Eric		
	Chaney December 8,		
	2020		
276	2022.09.28 Deposition of	Deposition Exhibit	H, F
410	Robert Sinners - Exhibit	Deposition Eximit	11, 1
	13 - December 2, 2020,		
	Misty Hampton e-		
	2		
	_		
	mailing Sinner re: Trump Campaign		

Exh	Document Description	Document Type	Objection
it No			S
277	2022.09.28 Deposition of	Deposition Exhibit	H, F, IS, I
	Robert Sinners - Exhibit		
	14 - December 13, 2020		
	Sinners text messages		
	with Alex		
	Kaufman		
278	2022.09.28 Deposition of	Deposition Exhibit	H, F, NR
	Robert Sinners - Exhibit		
	15 -		
	Washington Post Article		
	- Fake Trump Electors in		
	Georgia told to Shroud		
0.50	Plans in Secrecy	D D.L.	II D 375
279	2022.09.28 Deposition of	Deposition Exhibit	H, F, NE
	Robert Sinners - Exhibit		
	16 -		
200	Germany Declaration	D D.1.1.	II D C
280	2022.09.28 Deposition of	Deposition Exhibit	H, F, C
	Robert Sinners - Exhibit		
	17 - Raffensperger:		
	Coffee County Probe		
	Stalled Because		
001	Local Officials Lied	Danasitian Eulibit	ньс
281	2022.09.28 Deposition of Robert Sinners - Exhibit	Deposition Exhibit	H, F, C
	18 -		
	Doug Richards Short Version		
282	2022.09.28 Deposition of	Deposition Exhibit	H, F, I
202	Robert Sinners - Exhibit	Deposition Eximite	11, 1, 1
	19 -		
	Questions Raised in		
	Timeline of State		
	Response to Coffee		
	County Breach		
283	2022.09.28 Deposition of	Deposition Exhibit	H, F, C
	Robert Sinners - Exhibit	•	, , -
	20 - Questions Raised in		
	Timeline of State		

Exh	Document Description	Document Type	Objection s
10111	Response to Coffee County Breach		2
284	2022.09.28 Deposition of Robert Sinners - Exhibit 21 - May 7, 2021 Barnes E-mail Chain re Cyber Ninjas	Deposition Exhibit	H, F, C, M
285	2022.09.28 Deposition of Robert Sinners - Exhibit 22 - Excerpt from deposition of Michael Ian Shamos	Deposition Exhibit	H, F, NE, T, I
286	2022.09.28 Deposition of Robert Sinners - Exhibit 23 - MITRE Report	Deposition Exhibit	H, F
287	2022.09.28 Deposition of Robert Sinners - Exhibit 24 - May 20, 2021 Sinners Email to Fuchs	Deposition Exhibit	H, F
288	2022.09.28 Deposition of Robert Sinners - Exhibit 25 - March 3, 2021 Sinners asked to draft more responses	Deposition Exhibit	H, F
289	2022.09.28 Deposition of Robert Sinners - Exhibit 26 - 4/13/22 texts between Sinners and Marshall regarding Sterling Deposition	Deposition Exhibit	H, F, I, IS
290	2022.09.28 Deposition of Robert Sinners - Exhibit 27 - Sinners emails in	Deposition Exhibit	H, F

Exh it No	Document Description	Document Type	Objection s
	response to media		
	requests		
291	2022.09.28 Deposition of	Deposition Exhibit	H, F, NR
	Robert Sinners - Exhibit		
	28 -		
	2021 Convention		
	Resolutions Committee		
	Report		
292	2022.09.28 Deposition of	Deposition Exhibit	H, F, I, IS
	Robert Sinners - Exhibit		
	29 -		
	Text messages between		
202	Sinners and Gardner	D D.I.I.	7. C.
293	2022.09.28 Deposition of	Deposition Exhibit	M, OW
	Robert Sinners - Exhibit		
	30 -		
	Pictures, SOS		
904	Investigator Visit	Danasiti sa Eshihit	TO II M
294	2022.09.28 Deposition of Robert Sinners - Exhibit	Deposition Exhibit	F, H, M, NE
	31 - Kaufman email to		NE
	Sinners		
295	2022.09.28 Deposition of	Deposition Exhibit	F, H, M,
250	Robert Sinners - Exhibit	Deposition Eximate	NE
	32 -		TIL
	Affidavit of Alyssa Hope		
	Taylor		
296	2022.09.28 Deposition of	Deposition Exhibit	H, F
	Robert Sinners - Exhibit		
	33 - Presidential		
	Findings to Preserve		
	Collect and Analyze		
	National Security		
	Information Regarding		
	the 2020 General election		
297	2022.09.28 Deposition of	Deposition Exhibit	H, F, NE,
	Robert Sinners - Exhibit		M
	34 -		
	Still Lawsuit		

it No	S
THE PROPERTY OF THE PARTY OF TH	H E NE
298 2022.09.28 Deposition of Robert Sinners - Exhibit Deposition Exhibit	H, F, NE, M
35 -	1/1
Shawn Still Motion	
299 2022.09.28 Deposition of Deposition Exhibit	H, F, NE,
Robert Sinners - Exhibit	\mathbf{M}
36 -	
O.C.G.A. 21-2-524(b)	
Certificate of Service of	
Summons, Petition and	
Discovery	
300 2022.09.28 Deposition of Deposition Exhibit	H, F
Robert Sinners - Exhibit	
37 -	
Shawn Still e-mail,	
December 15, 2020	11 12
301 2022.09.28 Deposition of Deposition Exhibit	H, F
Robert Sinners - Exhibit 38 -	
Email from Christina	
Read, December 10, 2020	
302 2022.09.28 Deposition of Deposition Exhibit	H, F
Robert Sinners - Exhibit	11, 1
39 -	
Email thread, Christina	
Norton, January 1, 2021	
303 2022.12.16 Deposition of Deposition Exhibit	H, F, NE
Kevin Skoglund - Exhibit	
1 -	
Skoglund Declaration	
Confidential	II D ND
304 2022.12.16 Deposition of Deposition Exhibit	H, F, NE;
Phillip Stark - Exhibit 1 -	NR
Notice of Deposition	
of Deposition 305 2022.12.16 Deposition of Deposition Exhibit	H, F, NE,
Phillip Stark - Exhibit 2 -	M
Supplemental Report 66	141

Exh	Document Description	Document Type	Objection
it No			S
306	2022.12.16 Deposition of	Deposition Exhibit	H, F,
	Phillip Stark - Exhibit 3 -		
205	Tabulating Results	D D.1.1.	II D ND
307	2022.02.24 30(b)(6)	Deposition Exhibit	H, F, NE,
	Deposition of SOS		NR
	(Gabriel Sterling) -		
	Exhibit 1 - Fourt		
	Amended Notice of		
200	Deposition	Danasitian Enhibit	II D
308	2022.02.24 30(b)(6)	Deposition Exhibit	H, F
	Deposition of SOS		
	(Gabriel Sterling) -		
	Exhibit 2 - LinkedIn Web		
309	Page 2022 02 24 20(b)(c)	Donosition Exhibit	прі
509	2022.02.24 30(b)(6) Deposition of SOS	Deposition Exhibit	H, F, I
	(Gabriel Sterling) -		
	Exhibit 3 - Excerpted		
	pages of "Integrity		
	Counts" By		
	Raffensperger		
310	2022.02.24 30(b)(6)	Deposition Exhibit	H, F, NE,
010	Deposition of SOS	2 oposition annote	Unknown
	(Gabriel Sterling) -		0 111110 1111
	Exhibit 4 - Video		
	excerpts of speech by		
	Gabrial Sterling re:		
	Univeriste de geneve		
	function		
311	2022.02.24 30(b)(6)	Deposition Exhibit	H, F, NE
	Deposition of SOS		
	(Gabriel Sterling) -		
	Exhibit 5 - 7/15/19 State		
	Def's objections and		
	reposes to Curling		
	Plaintiffs' First Set of		
	Interrogatories		
312	2022.02.24 30(b)(6)	Deposition Exhibit	H, F, NE,
	Deposition of SOS		M

Exh it No	Document Description	Document Type	Objection s
10 111	(Gabriel Sterling) -		
	Exhibit 6 - State Defs'		
	Responses and		
	Objections to Curling		
	Plaintiffs' Second Set of		
	Interrogatories		
313	2022.02.24 30(b)(6)	Deposition Exhibit	H, F, NE
	Deposition of SOS		
	(Gabriel Sterling) -		
	Exhibit 7 - State		
	Defendants Responses to		
	First Requests for		
	Admissions		
314	2022.02.24 30(b)(6)	Deposition Exhibit	H, F
	Deposition of SOS		
	(Gabriel Sterling) -		
	Exhibit 8 - State		
015	Defendants 113751	D D.I.I.	TT 72 3 4
315	2022.02.24 30(b)(6)	Deposition Exhibit	H, F, M
	Deposition of SOS		
	(Gabriel Sterling) -		
	Exhibit 9 - State		
	Defendants 172679 thru 686		
316	2022.02.24 30(b)(6)	Deposition Exhibit	H, F
310	Deposition of SOS	Deposition Exhibit	11, 1
	(Gabriel Sterling) -		
	Exhibit 10 - State		
	Defendants 169353		
317	2022.02.24 30(b)(6)	Deposition Exhibit	H, F
011	Deposition of SOS	Deposition Eximate	11, 1
	(Gabriel Sterling) -		
	Exhibit 11 - State		
	Defendants 192602 thru		
	603.		
318	2022.02.24 30(b)(6)	Deposition Exhibit	H, F, NE,
	Deposition of SOS	_	Unknown
	(Gabriel Sterling) -		
	Exhibit 12 - Audio		

Exh	Document Description	Document Type	Objection s
	recording of telephone call.		
319	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 17 - State- Defendants 11151729 thru 781.	Deposition Exhibit	H, F
320	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 18 - Dominion Voting brochure re: Mobile ballot printing.	Deposition Exhibit	PK
321	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 19 - Georgia Code 21-2-498	Deposition Exhibit	NE
322	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 20 - Rule 183-1- 1504	Deposition Exhibit	F, H, I
323	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 21 - Arlo Document regarding Ballot manifest.	Deposition Exhibit	F, H, I, A
324	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 22 - 11-19-20 - Excel Spreadsheet regarding Arlo Audit report	Deposition Exhibit	H, F, NE, Unknown

	Document Description	Document Type	Objection
it No			\mathbf{s}
325	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) -	Deposition Exhibit	H, F, M
	Exhibit 23 - State of Georgia letterhead from		
	Brian Kemp to members of State Election Board regarding 2020		
	election		
326	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) -	Deposition Exhibit	H, F, Q, A
	Exhibit 24 - Audit Board Batch Sheet re: DeKalb Tucker Election Day		
327	2022.02.24 30(b)(6) Deposition of SOS	Deposition Exhibit	H, F, Q, A
	(Gabriel Sterling) - Exhibit 25 - Audit Board Batch Sheet regarding		
	DeKalb Tucker Library Advance		
328	2022.02.24 30(b)(6)	Deposition Exhibit	Unknown
	Deposition of SOS (Gabriel Sterling) - Exhibit 26		
329	2022.02.24 30(b)(6)	Deposition Exhibit	H, F, Q, A
	Deposition of SOS (Gabriel Sterling) -		
	Exhibit 27 - Audit Board		
	Batch Sheet re: DeKalb 2339		
	Absentee		
330	2022.02.24 30(b)(6)	Deposition Exhibit	H, F, Q, A
	Deposition of SOS (Gabriel Sterling) -		
	Exhibit 28 - Audit Board		
	Batch Sheet regarding DeKalb 1956 Absentee		
	Deltain 1990 Anseiltee		

Exh	Document Description	Document Type	Objection s
331	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 29 - Audit Board Batch Sheet regarding DeKalb 1836 Absentee	Deposition Exhibit	H, F, Q, A
332	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 30 - Senators Walker and Blackmon to members of the State Election Board regarding 2020 election	Deposition Exhibit	H, F, PK
333	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 31	Deposition Exhibit	Unknown
334	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 32 - Fox5Atlanta Web Page article regarding Software glitch cuases delay in counting thousands of votes in Gwinnett County	Deposition Exhibit	H, F
335	2022.02.24 30(b)(6) Deposition of SOS (Gabriel Sterling) - Exhibit 33 - Whittier Daily News web page artcile by Conny McCormack - A behind the scenes look at Georgia's vote counting.	Deposition Exhibit	H, F

	Document Description	Document Type	Objection
it No			S
336	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F, NE,
	(Gabriel Sterling) -		NR
	Exhibit 1 -		
	Plaintiffs Seventh		
	Amended Notice fo		
	Deposition		
337	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F, PK
	(Gabriel Sterling) -		
	Exhibit 2 -		
	Report of Investigation of		
	Blanchard		
338	2022.10.12 30(b)(6) SOS	Deposition Exhibit	C, OW, I,
	(Gabriel Sterling) -		H, F
	Exhibit 3 -		
	Photograph from		
	Youtube video of post-it		
	with password		
339	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F, IS, I,
	(Gabriel Sterling) -		M
	Exhibit 4 -		
	Series of tweets by		
	Sterling responding to		
0.40	Adida's tweet	D D.1.1.	II D C
340	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F, C,
	(Gabriel Sterling) -		PK
	Exhibit 5 -		
	2/10 transcript of		
	Secretary Raffensperger Interview		
341		Donosition Exhibit	приг
041	2022.10.12 30(b)(6) SOS (Gabriel Sterling) -	Deposition Exhibit	H, F, PK, I
	Exhibit 6 - Still photo		
	from the Carter Center,		
	Restoring Confidence		
	in American Elections		
	Panel 3 (April 29, 2022)		
342	2022.10.12 30(b)(6) SOS	Deposition Exhibit	F, H
044	(Gabriel Sterling) -	Deposition Lambit	1,11
	Exhibit 7 -		
<u> </u>	TATILUIU 1 -		

	Document Description	Document Type	Objection
it No			S
	Email chain ending with		
	5/11/21 from Watson to		
0.40	Jones	D D.I.I.	D 11
343	2022.10.12 30(b)(6) SOS	Deposition Exhibit	F, H
	(Gabriel Sterling) -		
	Exhibit 8 - Letter from		
	Ellis to Reynolds		
	regarding Request for		
	Assistance in		
244	investigation	Danasiti sa Eshihit	T2 11
344	2022.10.12 30(b)(6) SOS	Deposition Exhibit	F, H
	(Gabriel Sterling) -		
	Exhibit 9 - Email chain from		
	Germany to Ellis		
345	regarding Server	Donosition Exhibit	БП
040	2022.10.12 30(b)(6) SOS (Gabriel Sterling) -	Deposition Exhibit	F, H
	Exhibit 10 -		
	Email chain from		
	sterling to Miller		
	regarding Curling v.		
	Raffensperger; 1:17-CV-		
	2989		
346	2022.10.12 30(b)(6) SOS	Deposition Exhibit	F, H
	(Gabriel Sterling) -		
	Exhibit 11 -		
	Email from Germany to		
	ORR administration		
	regarding Open Records		
	Request		
347	2022.10.12 30(b)(6) SOS	Deposition Exhibit	F, H
	(Gabriel Sterling) -		
	Exhibit 12 -		
	UTC Message from		
	hampton to Voyles titled		
0.10	ORR	B 5.15.	T. 17
348	2022.10.12 30(b)(6) SOS	Deposition Exhibit	F, H
	(Gabriel Sterling) -		

	Document Description	Document Type	Objection
it No			S
	Exhibit 13 - Email from		
	Germany to Tyson		
	regarding GASOS ORR		
349	2022.10.12 30(b)(6) SOS	Deposition Exhibit	F, H
	(Gabriel Sterling) -		
	Exhibit 14 - Email chain		
	from Koth to Ellis		
	Regarding Opern		
	Records		
	Request		
350	2022.10.12 30(b)(6) SOS	Deposition Exhibit	F, H
	(Gabriel Sterling) -		
	Exhibit 15 - Sheet for		
	SEB2020-250-Coffee		
	County Misc		
351	2022.10.12 30(b)(6) SOS	Deposition Exhibit	I, OW
	(Gabriel Sterling) -		
	Exhibit 16 -		
	Interior stills taken from		
	video camera 1		
352	2022.10.12 30(b)(6) SOS	Deposition Exhibit	I, OW
	(Gabriel Sterling) -		
	Exhibit 17 -		
	Still shots from video of		
	Coffee County election		
	Board office		
353	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F, M, I
	(Gabriel Sterling) -		
	Exhibit 18 -		
	Tweet by Juha regarding		
	Mike Lindell's Plane		
	Flights		
354	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F
	(Gabriel Sterling) -		
	Exhibit 19 - Excel		
	Spreadsheet - IP		
	Addresses that have		
	downloaded		
	CC data		

Exh	Document Description	Document Type	Objection
it No			S
355	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F
	(Gabriel Sterling) -		
	Exhibit 20 - Email chain		
	from Maggio to		
	Federalattorney		
	regarding		
	Coffee County Forensics		
2 2 2	FedEx request		
356	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F, M
	(Gabriel Sterling) -		
	Exhibit 21 - Email from		
	Brown to Belinfante		
	regarding JSON Format Cast Vote Records on the		
	Internet		
357		Donosition Exhibit	H, F, M
557	2022.10.12 30(b)(6) SOS (Gabriel Sterling) -	Deposition Exhibit	Π, Γ, W
	Exhibit 22 -		
	Email from Johnson to		
	McClain regarding		
	SullivanStrickler /		
	Spalding County Board		
	fo Elections		
358	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F, NE,
	(Gabriel Sterling) -	r	$\mathbf{T}^{'}$
	Exhibit 23 -		
	Virtual Videotaped		
	30(b)(6) Deposition of		
	Sanford Merritt Beaver		
359	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F
	(Gabriel Sterling) -		
	Exhibit 24 - Rolling		
	Stone Article by Glawe		
	"Pro-Trump Georgia		
	Officials Plotted to Swipe		
	Voting Data. We Caugh		
0.7.7	Them."		
360	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F
	(Gabriel Sterling) -		

Exh	Document Description	Document Type	Objection s
10111	Exhibit 25 - Official Election Bulletin 11/17/20		2
361	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 26 - 12/9/20 Press Release from SOS regarding Opening investigation into Coffee County's handling recount	Deposition Exhibit	H, F
362	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 27 - Email from Favorito to Harding regarding Final Ballot inspection plan	Deposition Exhibit	H, F
363	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 28 - 5-5-21 Letter, to The Honorable Karen Fann, President, Arizona State Senate, from Karlan, Civil Rights Division, DOJ	Deposition Exhibit	H, F
364	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 29 - Dominion Voting, Customer Notification: Maintaining Secure Chain of Custory for Your Dominion Voting System	Deposition Exhibit	H, F
365	2022.10.12 30(b)(6) SOS (Gabriel Sterling) - Exhibit 30 - Press Release - MITRE Corporation, an	Deposition Exhibit	H, F, I

Exh	Document Description	Document Type	Objection s
	Independent Federal		
	Lab, finds Georgia		
	Election System Secure		
366	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F, I
	(Gabriel Sterling) -		
	Exhibit 31 - July 2022		
	MITRE Document -		
	Independent Technical		
	Review:		
	Security Analysis of		
	Georgia's ImageCast X		
	Ballot Marking Devices		
367	2022.10.12 30(b)(6) SOS	Deposition Exhibit	H, F
307	(Gabriel Sterling) -	Deposition Eximit	11, 1
	Exhibit 32 - E-mail		
	Chain Ending with		
	Wednesday, 8-18-21		
	12:49 PM E-mail, from		
	Evans, to Johnson, et al.,		
	Subject: RE: Spalding		
	County Equipment		
368	2021.11.05 Deposition of	Deposition Exhibit	H, F
	Rebecca Sullivan -		,
	Exhibit 1 -		
	2/28/20 Meeint Minutes		
	of SEB		
369	2021.11.05 Deposition of	Deposition Exhibit	H, F, NE
	Rebecca Sullivan -		
	Exhibit 2 -		
	Transcript from the SEB		
	hearing on 1/22/20		
370	2021.11.04 Deposition of	Deposition Exhibit	H, F
	Matthew Mashburn -		
	Exhibit 1 -		
	Meeting Minutes		
371	2022.09.02 Sullivan	Deposition Exhibit	C, H, F,
	Strickler 30(b)(6) (Dean		NE, M
	Felicetti) -		

Exh it No	Document Description	Document Type	Objection s
10 111	Exhibit 1 - Subpeona to		5
	testitfy		
372	2022.09.02 Sullivan	Deposition Exhibit	C, OW
	Strickler 30(b)(6) (Dean		
	Felicetti) -		
	Exhibit 2 - Picture of Jim		
	Nelson		
373	2022.09.02 Sullivan	Deposition Exhibit	C, OW
	Strickler 30(b)(6) (Dean		
	Felicetti) - Exhibit 3 -		
	Picture of Jennifer		
	Jackson		
374	2022.09.02 Sullivan	Deposition Exhibit	C, H, F,
	Strickler 30(b)(6) (Dean		OW
	Felicetti) -		
	Exhibit 4 - Picture of		
0=1	karuna Naik		G OTT
375	2022.09.02 Sullivan	Deposition Exhibit	C, OW
	Strickler 30(b)(6) (Dean		
	Felicetti) - Exhibit 5 -		
070	Picture of Paul Maggio	D '' E l'I'	O II E
376	2022.09.02 Sullivan	Deposition Exhibit	C, H, F
	Strickler 30(b)(6) (Dean		
	Felicetti) -		
	Exhibit 6 - Engagement		
377	Agreement 11/30/20 2022.09.02 Sullivan	Deposition Exhibit	C, H, F
311	Strickler 30(b)(6) (Dean	Deposition Eximit	O, 11, 1
	Felicetti) - Exhibit 7 -		
	Engagement Agreement,		
	MI, AZ, December 6,		
	2020		
378	2022.09.02 Sullivan	Deposition Exhibit	C, H, F
	Strickler 30(b)(6) (Dean		
	Felicetti) -		
	Exhibit 8 - January 8,		
	2021 Maggio email chain		
	invoice		

	Document Description	Document Type	Objection
it No 379	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 9 - Phone text	Deposition Exhibit	C, H, F, IS, I
380	message 8/12/22 2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 10 - Coffee County Board of Elections and Registration Elections Office Security Video	Deposition Exhibit	C, I, IS, OW
381	1/7/21 2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 11 - January 8, 2021 from 5pm to 6pm missing video	Deposition Exhibit	C, I, IS, OW
382	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 12 - Bates numbers 08122022 000236 to 265	Deposition Exhibit	C, I, IS, OW
383	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 13 - Password Memos, 08122022-000123 through 125	Deposition Exhibit	C, H, F, M
384	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 14 - Maggio hard drive contents	Deposition Exhibit	C, H, F, IS
385	2022.09.02 Sullivan Strickler 30(b)(6) (Dean	Deposition Exhibit	C, H, F, IS

Exh	Document Description	Document Type	Objection s
10 1 1	Felicetti) - Exhibit 15 - 8/17/22 Maggio Production Folder Structure		
386	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 16 - Bates Numbers 08122022-000126 through 136	Deposition Exhibit	C, H, F, IS
387	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 17 - 08122022-000137 through 161	Deposition Exhibit	C, H, F, IS
388	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 18 - Bates Numbers 08122022-000175 through 176	Deposition Exhibit	C, H, F
389	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 19 - Bates Numbers 08122022-000098 through 105	Deposition Exhibit	C, H, F, M
390	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) - Exhibit 20 - Bates Numbers 08122022- 000204 through 205	Deposition Exhibit	C, H, F, M, Unknown
391	2022.09.02 Sullivan Strickler 30(b)(6) (Dean Felicetti) -	Deposition Exhibit	C, H, F, IS

	Document Description	Document Type	Objection
it No			S
	Exhibit 21 - Excel		
	Attachment 08122022-		
200	000205	Describe B 1:1:4	O II E
392	2022.09.02 Sullivan	Deposition Exhibit	C, H, F
	Strickler 30(b)(6) (Dean Felicetti) - Exhibit 22 -		
	Bates Numbers		
	08122022-000022		
	through 33		
393	2022.09.02 Sullivan	Deposition Exhibit	C, H, F,
	Strickler 30(b)(6) (Dean	Deposition Eximate	M, IS
	Felicetti) -		141, 16
	Exhibit 23 - Maggio-		
	000057 58 Excel		
394	2022.09.02 Sullivan	Deposition Exhibit	C, H, F, M
	Strickler 30(b)(6) (Dean		, , ,
	Felicetti) - Exhibit 24 -		
	May 7, 2021 Barnes e-		
	mail chain re: Cyber		
	Ninjas		
395	2022.09.02 Sullivan	Deposition Exhibit	C, H, F,
	Strickler 30(b)(6) (Dean		NE, I
	Felicetti) - Exhibit 25 -		
	subpoena		0
396	2022.09.02 Sullivan	Deposition Exhibit	C, H, F
	Strickler 30(b)(6) (Dean		
	Felicetti) -		
	Exhibit 26 - STATE- DEFENDANTS-001		
	01937		
397	2022.09.02 Sullivan	Deposition Exhibit	C, H, F
001	Strickler 30(b)(6) (Dean	Deposition Painble	\cup , II, I
	Felicetti) - Exhibit 27 -		
	ICS Advisory		
	Vulnerabilities Affecting		
	Dominion Voting System		
	ImageCast X		
398	2022.09.02 Sullivan	Deposition Exhibit	C, OW, H,
	Strickler 30(b)(6) (Dean		F

Exh	Document Description	Document Type	Objection
it No			S
	Felicetti) -		
	Exhibit 28 - Copy of		
	Check to Defending the		
	Republic		
399	2022.11.16 Deposition of	Deposition Exhibit	F, H, M,
	Blake Voyles - Exhibit 1 -		NE
400	Subpoena	D D.I.I.	D II IO
400	2022.11.16 Deposition of	Deposition Exhibit	F, H, IS
	Blake Voyles - Exhibit 2 -		
	Ed Varilag Navambar 2020		
	Voyles November 2020 Election 23 Office Visits		
401	2022.11.16 Deposition of	Deposition Exhibit	H, F
401	Blake Voyles - Exhibit 3 -	Deposition Exhibit	11, 1
	CGG20220001857 to 858		
402	2022.11.16 Deposition of	Deposition Exhibit	H, F, M, I
102	Blake Voyles - Exhibit 4 -	Beposition Emiliate	11, 1, 1,1,1
	1-8-		
	21 e-mail, Voyles to		
	Holmes		
403	2022.11.16 Deposition of	Deposition Exhibit	H, F, M
	Blake Voyles - Exhibit 5 -		
	11-16-		
	20 e-mail, Hampton to		
	Voyles		
404	2022.11.16 Deposition of	Deposition Exhibit	H, F, M
	Blake Voyles - Exhibit 6 -		
	12-16-		
	20 e-mail, redacted to		
405	bemarkdkerik	Danagitian Ewhibit	прт
405	2022.11.16 Deposition of	Deposition Exhibit	H, F, I
	Blake Voyles - Exhibit 7 - 12-21-		
	20 e-mail, to Voyles		
406	2022.11.16 Deposition of	Deposition Exhibit	H, F
	Blake Voyles - Exhibit 8 -		, -
	SOS Opens Investigation		
	into Coffee County's		
	Handling recount		

Exh		Document Type	Objection
it No.	2022.11.16 Deposition of	Donosition Exhibit	H, F, M
407	Blake Voyles - Exhibit 9 -	Deposition Exhibit	11, 1, 11
	CGG20220002034 to 035		
408	2022.11.16 Deposition of	Deposition Exhibit	I, IS, OW
100	Blake Voyles - Exhibit 10		1, 12, 5
	-		
	Photographs		
409	2022.11.16 Deposition of	Deposition Exhibit	I, IS, OW
	Blake Voyles - Exhibit 11		
	- photographs		
410	2022.11.16 Deposition of	Deposition Exhibit	I, IS, OW
	Blake Voyles - Exhibit 12		
	-1		
411	photographs	Danagition Embilit	пъ
411	2022.11.16 Deposition of Blake Voyles - Exhibit 13	Deposition Exhibit	H, F
	- Rule 183-1-1205		
412	2022.11.16 Deposition of	Deposition Exhibit	H, F, IS, I
	Blake Voyles - Exhibit 14		11, 1, 10, 1
	- 3-8-		
	21 text message, Voyles		
	to Marks		
413	2022.11.16 Deposition of	Deposition Exhibit	H, F, IS, I,
	Blake Voyles - Exhibit 15		M
	- 2-19-		
	21 combined text		
111	messages folder	Denogition Exhibit	н в м
414	2022.11.16 Deposition of Blake Voyles - Exhibit 16	Deposition Exhibit	H, F, M
	- 12-		
	16-20 e-mail, Voyles to		
	Chaney		
415	2022.11.16 Deposition of	Deposition Exhibit	H, F, I, IS
	Blake Voyles - Exhibit 17		
	- 1-4-		
	21 text message, Thomas		
416	2022.11.16 Deposition of	Deposition Exhibit	I, OW
	Blake Voyles - Exhibit 18		

Exh it No	Document Description	Document Type	Objection s
	- 1-7-		
	21 2:19 p.m. photographs		
417	2022.11.16 Deposition of	Deposition Exhibit	I, OW
	Blake Voyles - Exhibit 19	1	,
	- 12-7-		
	20 10:28 a.m.		
	photographs		
418	2022.11.16 Deposition of	Deposition Exhibit	H, F, M
	Blake Voyles - Exhibit 20		
	- 12-8-		
	20 e-mail, Voyles to		
	Foskey		
419	2022.11.16 Deposition of	Deposition Exhibit	I, OW
	Blake Voyles - Exhibit 21		
	- 1-6-		
	21 4:17 p.m. photographs		
420	2022.11.16 Deposition of	Deposition Exhibit	F, H
	Blake Voyles - Exhibit 22		
	- 1-8-		
	21 e-mail, Voyles to		
491	Holmes	Danagition Fubilit	EH
421	2022.11.16 Deposition of	Deposition Exhibit	F, H
	Blake Voyles - Exhibit 23 - 12-8-		
	20 e-mail, Summers to		
	Voyles		
422	2022.11.16 Deposition of	Deposition Exhibit	F, H, M
	Blake Voyles - Exhibit 24		_ , _ , _ , _ , _ ,
	- 12-8-		
	20 e-mail, Voyles to		
	Carden		
423	2022.08.31 Deposition of	Deposition Exhibit	F, H, NE,
	Edward Lindsey -		M
	Exhibit 1 -		
	June 15 Proposed		
	Redactions, Halderman		
	Report		
424	2022.08.31 Deposition of	Deposition Exhibit	F, H, NE,
	Edward Lindsey -		T, I

Exh	Document Description	Document Type	Objection s
	Exhibit 2 - Excerpt from 10/29/2021 Transcript of Juan Gilbert		
425	2022.08.31 Deposition of Edward Lindsey - Exhibit 3 - State-Defendants- 00202234	Deposition Exhibit	F, H
426	2022.08.31 Deposition of Edward Lindsey - Exhibit 4 - State Defendants 00202239	Deposition Exhibit	F, H
427	2022.08.31 Deposition of Edward Lindsey - Exhibit 5 - Article, "Pro- Trump tech team copied Georgia election data, records show"	Deposition Exhibit	F, H
428	2022.08.31 Deposition of Edward Lindsey - Exhibit 6 - Video clip, Restoring Elections Panel	Deposition Exhibit	H, F, NE, Unknown
429	2022.08.31 Deposition of Edward Lindsey - Exhibit 7 - May 7, 2021 Barnes E- mail Chain re: Cyber Ninjas	Deposition Exhibit	H, F, M, C
430	2022.08.31 Deposition of Edward Lindsey - Exhibit 8 - Excerpt from James A. Barnes, Jr. transcript	Deposition Exhibit	H, F, NE, T, I
431	2022.08.31 Deposition of Edward Lindsey - Exhibit 9 -	Deposition Exhibit	H, F, I, IS

Exh	Document Description	Document Type	Objection
it No			S
	State Defendants		
	00205051-53		
432	2022.08.31 Deposition of	Deposition Exhibit	F, H, OW
	Edward Lindsey -		
	Exhibit 10 -		
	State Defendants 202613		
433	2022.11.18 Deposition of	Deposition Exhibit	F, H, M,
	Doug Logan - Exhibit 1 -		NE
	7/27/22 Ichter Davis		
	Letter		
434	2022.11.18 Deposition of	Deposition Exhibit	F, H, M
	Doug Logan - Exhibit 2 -		
	4/19/21 Board of		
40.	Selectment Meeting	D D.I.I.	
435	2022.11.18 Deposition of	Deposition Exhibit	F, H, IS, I
	Doug Logan - Exhibit 3 -		
	Logan		
490	Messaging Thread	December B. L. L.	
436	2022.11.18 Deposition of	Deposition Exhibit	F, H, IS
	Doug Logan - Exhibit 4 -		
437	Logan Messaging Thread 2022.11.18 Deposition of	Deposition Exhibit	F, H, OW
457	Doug Logan - Exhibit 5 -	Deposition Exhibit	F, 11, OW
	Data		
	Log		
438	2022.11.18 Deposition of	Deposition Exhibit	F, H, OW
100	Doug Logan - Exhibit 6 -	Deposition Eximate	1, 11, 0 **
	SullivanStrickler Log		
	Files		
439	2022.11.18 Deposition of	Deposition Exhibit	OW, I
	Doug Logan - Exhibit 7 -	r	, —
	Photographs		
440	2022.11.18 Deposition of	Deposition Exhibit	F, H
	Doug Logan - Exhibit 8 -	-	
	1/8/21 Email String From		
	Paul Maggio To Sidney		
	Powell		

Exh	Document Description	Document Type	Objection
it No			s
441	2022.11.18 Deposition of Doug Logan - Exhibit 9 - screenshot	Deposition Exhibit	F, H, OW, Q
442	2022.11.18 Deposition of Doug Logan - Exhibit 10 - Coalition Plaintiffs' Response on Brief on Law Enforcement Investigative	Deposition Exhibit	F, H, NE, M
443	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 1 - subpoena	Deposition Exhibit	F, H, NE, M
444	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 2 - Jeffrey Lenberg Declaration October 21, 2022	Deposition Exhibit	F, H
445	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 3 - Logan Signal Messages	Deposition Exhibit	F, H, IS, I
446	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 4 - Harvey Memo on system copies	Deposition Exhibit	F, H
447	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 5 - Coffee County ICC & ICP Reports	Deposition Exhibit	F, H, M, A
448	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 6 - Coffee County and Pierce County Records Request	Deposition Exhibit	F, H, M, A

Exh	Document Description	Document Type	Objection
it No			S
449	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 7 -	Deposition Exhibit	OW, I
	Color photograph, Cellebrite kit for copying		
450	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 8 - Measuring the desk message	Deposition Exhibit	F, H, I
451	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 9 - Color photograph, Lenberg light ring	Deposition Exhibit	OW, I
452	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 11 - Color photograph, pictures coming	Deposition Exhibit	OW, I
453	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 12 - ICP - Analysis - Updated, Dominion 5.5	Deposition Exhibit	F, H, M
454	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 13 - handwritten notes	Deposition Exhibit	F, H, A
455	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 14 - Thumb drive contents - CCBOE Docs responsive to subpoenas	Deposition Exhibit	F, H, A
456	2022.11.21 Deposition of Jeffrey Lenberg - Exhibit 15 - Ben Cotton Signal &	Deposition Exhibit	F, H

Exh it No	Document Description	Document Type	Objection s
10 111	Coffee County related		5
	emails		
457	2022.11.21 Deposition of	Deposition Exhibit	F, H, A,
	Jeffrey Lenberg - Exhibit		M, I
	16 -		
	Moncla Signal		
	Communications		
	Annotated		
458	2022.11.21 Deposition of	Deposition Exhibit	F, H, M
	Jeffrey Lenberg - Exhibit		
	17 -		
	Lenberg vote stealing		
	attack		
459	2019.07.24 Deposition of	Deposition Exhibit	F, H, NE,
	Lynn Ledford - Exhibit 1		NR
	-		
	Notice of Deposition		
460	2019.07.24 Deposition of	Deposition Exhibit	F, H, NE,
	Lynn Ledford - Exhibit 2		M
	-		
	Subpoena		
461	2019.07.24 Deposition of	Deposition Exhibit	F, H, A,
	Lynn Ledford - Exhibit 3		M, I
	- E- mail from Ms. Black		
	6/21/19 regarding		
100	provisional ballots	D D.I.I.	D II 34
462	2019.07.24 Deposition of	Deposition Exhibit	F, H, M
	Lynn Ledford - Exhibit 4		
	- Voter		
	Comments and Concerns		
400	Forms	D	TA II N/I
463	2019.07.24 Deposition of	Deposition Exhibit	F, H, M,
	Lynn Ledford - Exhibit 5		104, NR
	Today was a set of		
	Intergovernmental		
404	agreement	Developing Entrity	A TO II NA
464	2019.07.24 Deposition of	Deposition Exhibit	A, F, H, M
	Lynn Ledford - Exhibit 6		
	-		

Creating and saving export File in GEMS 465 2019.07.24 Deposition of Lynn Ledford - Exhibit 7 - OEB 466 2019.07.24 Deposition of Lynn Ledford - Exhibit 8 - Election Related files 467 2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
465 2019.07.24 Deposition of Lynn Ledford - Exhibit 7 - OEB 466 2019.07.24 Deposition of Lynn Ledford - Exhibit 8 - Election Related files 467 2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County Report Gwinnett County November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
Lynn Ledford - Exhibit 7 - OEB 466 2019.07.24 Deposition of Lynn Ledford - Exhibit 8 - Election Related files 467 2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
- OEB 466 2019.07.24 Deposition of Lynn Ledford - Exhibit 8 - Election Related files 467 2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County Report Gwinnett County Report Gwinnett County Report Gwinnett County	H
466 2019.07.24 Deposition of Lynn Ledford - Exhibit 8 - Election Related files 467 2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County Report Gwinnett County November 6, 2018	Н
Lynn Ledford - Exhibit 8 - Election Related files 467 2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	H
Election Related files 467 2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
467 2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
467 2019.07.24 Deposition of Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
Lynn Ledford - Exhibit 9 - Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
Election Summary Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
Report Gwinnett county November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
November 6, 2018 468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
468 2019.07.24 Deposition of Lynn Ledford - Exhibit 10 - Election Summary Report Gwinnett County	
10 - Election Summary Report Gwinnett County	
Report Gwinnett County	
N 1. 1 0010	
March 1, 2016	
469 2019.07.24 Deposition of Deposition Exhibit F, H	
Lynn Ledford - Exhibit	
11 - E-	
mail from Mr. Newby 8/23/16	
470 2019.07.24 Deposition of Deposition Exhibit F, H,	NE
Lynn Ledford - Exhibit	TIL
Declaration	
471 2019.07.24 Deposition of Deposition Exhibit F, H,	NE
Lynn Ledford - Exhibit	
Declaration	
472 2019.07.24 Deposition of Deposition Exhibit F, H,	NE
Lynn Ledford - Exhibit	
14 - Declaration	
473 2019.07.24 Deposition of Deposition Exhibit F, H	
Lynn Ledford - Exhibit	

Exh it No	Document Description	Document Type	Objection s
	15 - Election Results		
	Report		
474	2019.07.24 Deposition of	Deposition Exhibit	F, H, I
	Lynn Ledford - Exhibit		
	16 -		
	Election Results Report		
475	2019.07.24 Deposition of	Deposition Exhibit	F, H, I
	Lynn Ledford - Exhibit		
	17 - Gwinnett County		
	Election Day Manager		
	manual		
476	2019.07.24 Deposition of	Deposition Exhibit	F, H
	Lynn Ledford - Exhibit		
	18 -		
4==	OEB January 30, 2019	D D.I.I.	A D II
477	2019.07.24 Deposition of	Deposition Exhibit	A, F, H
	Lynn Ledford - Exhibit		
	19 -		
170	Ballot Image Report	Danasitian Eulibit	E H ND
478	2021.11.4 Deposition of Anh Le - Exhibit 1 -	Deposition Exhibit	F, H, NR
	Minutes		
479	2022.08.08 Deposition of	Deposition Exhibit	F, H, NE,
413	Cathleen Latham -	Deposition Eximit	NP
	Exhibit 1 -		111
	Subpoena		
480	2022.08.08 Deposition of	Deposition Exhibit	F, H, NE,
	Cathleen Latham -		NP
	Exhibit 2 -		
	Subpoena		
481	2022.08.08 Deposition of	Deposition Exhibit	A, C, 104,
	Cathleen Latham -		NR
	Exhibit 3 -		
	Screenshot from		
	Hampton Video		
482	2022.08.08 Deposition of	Deposition Exhibit	F, H, I,
	Cathleen Latham -		NE
	Exhibit 4 -		
	Letter dated 12/23/20 re		

Exh it No	Document Description	Document Type	Objection
16 100	Notice of Obligation to		S
	preserve documents		
483	related to dominion 2022.08.08 Deposition of	Deposition Exhibit	A, F, H
400	Cathleen Latham -	Deposition Exhibit	A, Γ, Π
	Exhibit 5 -		
	Draft executive order		
	dated 12/16/20 from		
484	President Trump	Deposition Exhibit	F, H
404	2022.08.08 Deposition of Cathleen Latham -	Deposition Exhibit	1', 11
	Exhibit 6 -		
	iPhone text message		
	string screenshots		
485	2022.08.23 Deposition of	Deposition Exhibit	NE
	Janice Johnston - Exhibit 1 -		
	Plaintiffs' Identification		
	of Outstanding Discovery		
	Disputes		
486	2022.08.23 Deposition of	Deposition Exhibit	C, F, H
	Janice Johnston - Exhibit 2 -		
	Security Analysis of		
	Georgia's ImageCast X		
	BMDs		
487	2022.08.23 Deposition of	Deposition Exhibit	F, H, NE,
	Janice Johnston - Exhibit 3 - Excerpt testimony		T, I
	from Videotaped		
	videoconference		
	deposition of Juan		
400	Gilbert	D D.1.	O D II
488	2022.08.23 Deposition of Janice Johnston - Exhibit	Deposition Exhibit	C, F, H
	4 - Activity Alert: ICSA-		
	22-XXX-XX		
	Vulnerabilities Affecting		

Exh	Document Description	Document Type	Objection s
	Dominion Voting Systems ImageCast X		~
489	2022.08.23 Deposition of Janice Johnston - Exhibit 5 - Key Photos from	Deposition Exhibit	C, M, 104, I, NR
	production		
490	2022.08.23 Deposition of Janice Johnston - Exhibit 6 - People who have	Deposition Exhibit	F, H,
	downloaded CC data		
491	2022.08.23 Deposition of Janice Johnston - Exhibit 7 - Declaration of Benjamin	Deposition Exhibit	F, H, NE,
492	R. Cotton 2022.08.23 Deposition of	Deposition Exhibit	F, H, M
102	Janice Johnston - Exhibit 8 - May 7, 2021 Barnes' E- mail chain re: Cyber Ninjas	Beposition Bannott	1,11,11
493	2022.08.23 Deposition of Janice Johnston - Exhibit 9 - Excerpt from the deposition of James A. Barnes	Deposition Exhibit	F, H, NE, T, I
494	2022.08.23 Deposition of Janice Johnston - Exhibit 10 - E- mail string, Renewed Letter Petition to State Election Board, dated June 6, 2022, at 10:50 a.m.	Deposition Exhibit	F, H
495	2022.07.20 Deposition of James Barnes, Jr Exhibit 1 -	Deposition Exhibit	F, H

	Document Description	Document Type	Objection
it No			S
	October 27, 2021 email		
	chain		
496	2022.07.20 Deposition of	Deposition Exhibit	C, F, H
	James Barnes, Jr		
	Exhibit 2 - ICS Advisory,		
	"Vulnerabilities Affecting		
	Dominion Voting		
	Systems ImageCast X		
497	2022.07.20 Deposition of	Deposition Exhibit	F, H
	James Barnes, Jr		
	Exhibit 3 - April/May		
	2021 email chain with		
400	attachment	D D 1 1 1	D. II
498	2022.07.20 Deposition of	Deposition Exhibit	F, H
	James Barnes, Jr		
	Exhibit 4 -		
	April/May 2021 email		
400	chain	D ::: E 1:1::	O E II
499	2022.07.20 Deposition of	Deposition Exhibit	C, F, H,
	James Barnes, Jr		104, NR
	Exhibit 5 - Photo of Post-		
500	it note	Denosition Exhibit	СЕЦ
500	2022.07.20 Deposition of	Deposition Exhibit	C, F, H
	James Barnes, Jr Exhibit 6 -		
	May 2021 email chain with attachment		
501	2022.07.20 Deposition of	Deposition Exhibit	F, H
001	James Barnes, Jr	Deposition Exhibit	1, 11
	Exhibit 7 - Coffee County		
	Board of Elections and		
	Registration Monthly		
	Board Meeting,		
	April 13, 2021, 9:30 AM		
502	2022.07.20 Deposition of	Deposition Exhibit	F, H, 104,
	James Barnes, Jr	•	NR
	Exhibit 8 -		
	Invoice dated 4/13/2021		

	Document Description	Document Type	Objection
it No	2022 21 21 7	D B.I.I.	S
503	2022.01.21 Deposition of	Deposition Exhibit	A, F, H
	Derrick Gilstrap -		
	Exhibit 4 -		
	State-Defendants-		
504	00113529 - 113530	Danasitian Ershibit	БП
504	2022.01.21 Deposition of	Deposition Exhibit	F, H
	Derrick Gilstrap - Exhibit 5 -		
	State-Defendants-		
	00108790 - 00108791		
505	2022.01.21 Deposition of	Deposition Exhibit	F, H
303	Derrick Gilstrap -	Deposition Eximit	1, 11
	Exhibit 6 -		
	State-Defendants-		
	00110732- 00110734		
506	2022.01.21 Deposition of	Deposition Exhibit	F, H
	Derrick Gilstrap -		_ ,
	Exhibit 7 - E-		
	mail string to Brower		
	and others from		
	Cummings, 10/22/2020		
	State-Defendants-		
	00169113 - 00169114		
507	2023.01.03 Deposition of	Deposition Exhibit	NE, NR
	Alex Halderman -		
	Exhibit 1 - 12-		
	20-22, State Defendants'		
	Notice to Take the		
	Second Expert		
	Desposition of Alex		
	Halderman		
508	2023.01.03 Deposition of	Deposition Exhibit	NE, F, H,
	Alex Halderman -		M
	Exhibit 2 -		
	Declaration of Alex		
	Halderman Re: The		
F 00	Above-captioned action.	Developing Enhance	NID D II
509	2021.10.21 Deposition of	Deposition Exhibit	NE, F, H
	Juan Gilbert - Exhibit 1 -		

Exh	Document Description	Document Type	Objection s
	Declaration of Juan Gilbert		2
510	2021.10.21 Deposition of Juan Gilbert - Exhibit 2 - Document Entitled "Georgia Voter Verification Study"	Deposition Exhibit	F, H
511	2021.10.21 Deposition of Juan Gilbert - Exhibit 3 - United States Patent, No. US 11.036,442 B2	Deposition Exhibit	F, H
512	2021.10.21 Deposition of Juan Gilbert - Exhibit 4 - Article entitled "Why computer scientists prefer paper ballots"	Deposition Exhibit	F, H
513	2021.10.21 Deposition of Juan Gilbert - Exhibit 5 - Document labeled "Exhibit A"	Deposition Exhibit	C, F, H
514	2021.10.21 Deposition of Juan Gilbert - Exhibit 6 - E-mail string, top e-mail to Scott Tucker from Michael Barnes	Deposition Exhibit	F, H
515	2021.10.21 Deposition of Juan Gilbert - Exhibit 7 - Twitter page	Deposition Exhibit	F, H
516	2021.10.21 Deposition of Juan Gilbert - Exhibit 8 - Letter to Juan E. Gilbert, Ph.D. from Bryan P. Tyson, dated 11-8- 19	Deposition Exhibit	NE, F, H
517	2021.10.21 Deposition of Juan Gilbert - Exhibit 9 -	Deposition Exhibit	F, H

	Document Description	Document Type	Objection
it No			S
	Trial		
	transcript, dated 3-24-09	D D 1 11	D 11
518	2021.11.05 Deposition of	Deposition Exhibit	F, H
	Sarah Ghazal - Exhibit 1		
	- Tweet		
	by Sara Ghazal, Dated 2/28/20		
519	2021.11.05 Deposition of	Deposition Exhibit	F, H
010	Sarah Ghazal - Exhibit 2	Deposition Exhibit	1, 11
	- email		
	chain		
520	2021.11.05 Deposition of	Deposition Exhibit	A, F, H
	Sarah Ghazal - Exhibit 3		
	-		
	STATE-DEFENDANTS-		
	00201663 through -1664		
521	2021.11.05 Deposition of	Deposition Exhibit	F, H
	Sarah Ghazal - Exhibit 4		
	- Tweet		
	by Sara Ghazal, Dated		
F 00	2/28/2020	D '(' E 1'1')	D II
522	2021.11.05 Deposition of Sarah Ghazal - Exhibit 5	Deposition Exhibit	F, H
	- Tweet		
	by Sara Ghazal		
523	2022.01.18 Deposition of	Deposition Exhibit	F, H
020	David Hamilton - Exhibit	Deposition Eximite	1,11
	1 -		
	Email Chain,		
	FORTALICE001200		
	through -001201		
524	2022.01.18 Deposition of	Deposition Exhibit	F, H
	David Hamilton - Exhibit		
	2 -		
	LinkedIn Profile of David		
	Hamilton	D 7.17.	D 11
525	2022.01.18 Deposition of	Deposition Exhibit	F, H
	David Hamilton - Exhibit		
	3 - Email Chain dated		

	Document Description	Document Type	Objection
it No			S
	August 2016, Bates		
	Numbers		
	FORTALICE000002952		
	through -2953		
526	2022.01.18 Deposition of	Deposition Exhibit	F, H
	David Hamilton - Exhibit		
	4 - Fortalice Red Team		
	Penetration Test and		
	Cyber Risk Assessment		
	Report for		
	State of Georgia, Office of		
	the Secretary of State,		
	November 2018, Bates		
	Numbers Payton 000070		
	through		
	-000119		
527	2022.01.18 Deposition of	Deposition Exhibit	F, H, NE
	David Hamilton - Exhibit		
	5 -		
	Declaration of David		
	Hamilton		
528	2022.01.18 Deposition of	Deposition Exhibit	F, H
	David Hamilton - Exhibit		
	6 - Task order from		
	Fortalice to the Secretary		
	of State's office dated		
	March 11, 2021,		
	Bates Numbers		
	FORTALICE000001		
	through -2		
529	2022.01.18 Deposition of	Deposition Exhibit	A, F, H
	David Hamilton - Exhibit		
	7 - Weekly Updates from		
	Fortalice to the Secretary		
	of State's Office, Bates		
	Numbers		
	FORTALICE002781		
	through -2788		

Exh	Document Description	Document Type	Objection
it No			S
530	2022.01.18 Deposition of David Hamilton - Exhibit 8 - Email Chain, Bates Numbers STATE- DEFENDANTS- 00126678 through - 126682	Deposition Exhibit	F, H
531	2022.01.18 Deposition of David Hamilton - Exhibit 9 - Email Chain, Bates Numbers STATE- DEFENDANTS- 00126696 through - 126698	Deposition Exhibit	F, H
532	2022.01.18 Deposition of David Hamilton - Exhibit 10 - News Article, "UPDATE: Ransomware Attackers Hit Hall County Election Infrastructure, dated October 23, 2020	Deposition Exhibit	F, H
533	2022.01.18 Deposition of David Hamilton - Exhibit 11 - Email Chain, Bates Number STATE- DEFENDANTS- 00104972	Deposition Exhibit	F, H
534	2022.01.18 Deposition of David Hamilton - Exhibit 12 - Email Chain, Bates Numbers STATE- DEFENDANTS- 00158821 through -158822	Deposition Exhibit	F, H
535	2022.01.18 Deposition of David Hamilton - Exhibit 13 - Election Office	Deposition Exhibit	A, F, H

	Document Description	Document Type	Objection
it No			S
	Notes, 10 AM 6/15/20		
	Meeting, Bates Numbers		
	STATE-DEFENDANTS-		
	00158823		
536	through -158825 2022.01.18 Deposition of	Deposition Exhibit	F, H
990	David Hamilton - Exhibit	Deposition Exhibit	г, 11
	14 - Email Chain, Bates		
	Numbers STATE-		
	DEFENDANTS-		
	00171971		
	through -171973		
537	2022.01.18 Deposition of	Deposition Exhibit	F, H
	David Hamilton - Exhibit		
	15 - Email Chain, Bates		
	Numbers		
	FORTALICE001209		
	through		
538	-1212 2022.01.18 Deposition of	Donosition Exhibit	F, H, NE
990	David Hamilton - Exhibit	Deposition Exhibit	r, 11, NE
	16 - Supplemental		
	Declaration of David		
	Hamilton		
539	2022.01.18 Deposition of	Deposition Exhibit	F, H
	David Hamilton - Exhibit		
	17 - Email Chain, Bates		
	Numbers STATE-		
	DEFENDANTS-		
	00126614		
F 40	through -126616	Danasitian Enlist	12 11
540	2022.01.18 Deposition of David Hamilton - Exhibit	Deposition Exhibit	F, H
	18 - Email Chain, Bates		
	Numbers		
	FORTALICE001163		
	through		
	FORTALICE001166		

	Document Description	Document Type	Objection
it No			S
541	2022.01.18 Deposition of David Hamilton - Exhibit 19 - Report from Fortalice Solutions dated July 14, 2020, Bates Numbers FORTALICE000625	Deposition Exhibit	F, H
	through -629		
542	2022.01.18 Deposition of David Hamilton - Exhibit 20 - Email from David Hamilton dated 4/29/2021, Bates Number STATE-DEFENDANTS- 00170625	Deposition Exhibit	F, H
543	2022.01.18 Deposition of David Hamilton - Exhibit 21 - Email from Dave Hamilton dated 8/21/2020, Bates Number STATE-DEFENDANTS- 00161203	Deposition Exhibit	F, H
544	2022.01.18 Deposition of David Hamilton - Exhibit 22 - Document, Bates Numbers STATE- DEFENDANTS- 00161204.xl sx through -161204.xlsx	Deposition Exhibit	A, F, H
545	2022.01.18 Deposition of David Hamilton - Exhibit 23 - Document Titled "2020 Security of the Voter Registration System Artifacts and Attestation Pursuant to Rule 590-8- 301" dated December	Deposition Exhibit	F, H, I

Exh	-	Document Type	Objection s
	18, 2020, Bates Numbers STATE-DEFENDANTS- 00182171 through -00182214		
546	2022.01.18 Deposition of David Hamilton - Exhibit 24 - Email Chain, Bates Numbers STATE- DEFENDANTS- 00182118 through -182120	Deposition Exhibit	F, H
547	2022.11.11 Deposition of Misty Hampton - Exhibit 1 - Article, Secretary of State's Office Opens Investigation into Coffee County's Handling Recount	Deposition Exhibit	F, H
548	2022.11.11 Deposition of Misty Hampton - Exhibit 2 - Text string messages, Gary with Dominion	Deposition Exhibit	F, H
549	2022.11.11 Deposition of Misty Hampton - Exhibit 3 - String of text messages with Eric Chaney	Deposition Exhibit	F, H
550	2022.11.11 Deposition of Misty Hampton - Exhibit 4 - String of text messages between Misty Hampton and Eric Chaney	Deposition Exhibit	F, H
551	2022.11.11 Deposition of Misty Hampton - Exhibit 5 -	Deposition Exhibit	A, F, H

	Document Description	Document Type	Objection
it No			S
	Chart of "Confidential"		
	text messages		
552	2022.11.11 Deposition of	Deposition Exhibit	F, H
	Misty Hampton - Exhibit		
	6 - Messages - Andy		
	Thomas & Ernestine		
	Thomas-Clark and		
	Eric Chaney and		
	Matthew McC and		
	Wendell Stone		
553	2022.11.11 Deposition of	Deposition Exhibit	F, H
	Misty Hampton - Exhibit		
	7 - E- mail from Misty		
	Hampton to Open		
	Records Request, dated		
	March 31, 2021	B 131	A 77 TT
554	2022.11.11 Deposition of	Deposition Exhibit	A, F, H,
	Misty Hampton - Exhibit		IS, I
	8 -		
	Time sheet review	D :: D l :l :	D. II
555	2022.11.11 Deposition of	Deposition Exhibit	F, H
	Misty Hampton - Exhibit		
	9 -		
	Text messages from		
	James Dom tech	Danasitian Enhibit	IZ II
556	2022.11.11 Deposition of	Deposition Exhibit	F, H
	Misty Hampton - Exhibit		
	10 - Misty video		
	production - CCBOE		
	responses to Plaintiffs		
557	subpoenas	Denogition Exhibit	БП
997	2022.11.11 Deposition of	Deposition Exhibit	F, H,
	Misty Hampton - Exhibit 11 -		
	Lindell lands in Douglas		
558	2022.11.11 Deposition of	Deposition Exhibit	NE, A, F,
000	Misty Hampton - Exhibit	Deposition Exilinit	H, IS, M
	12 -		11, 10, 11
	Shawn Still Complaint		
	Shawh Sun Complaint		

Exh	Document Description	Document Type	Objection
559	2022.11.11 Deposition of Misty Hampton - Exhibit	Deposition Exhibit	F, H
	13 - Misty Hampton e- mailing Robert Sinners' Personal Email		
560	2022.11.11 Deposition of Misty Hampton - Exhibit 14 - E- mail from Christina Read, Thursday, December 10, 2020	Deposition Exhibit	F, H
561	2022.11.11 Deposition of Misty Hampton - Exhibit 15 - Misty Hampton e-mails from other county users	Deposition Exhibit	F, H, I
562	2022.11.11 Deposition of Misty Hampton - Exhibit 16 - Photograph of password for 2020 Election	Deposition Exhibit	A
563	2022.11.11 Deposition of Misty Hampton - Exhibit 17 - Photograph, Miles Latham on January 7	Deposition Exhibit	104, F
564	2022.11.11 Deposition of Misty Hampton - Exhibit 18 - Photograph of young man walking to building	Deposition Exhibit	104, F
565	2022.11.11 Deposition of Misty Hampton - Exhibit 19 - Photograph, Alex Cruce, on January 7	Deposition Exhibit	M
566	2022.11.11 Deposition of Misty Hampton - Exhibit 20 -	Deposition Exhibit	104, F

Exh	Document Description	Document Type	Objection
it No			s
	Photograph of Misty's		
	office, GEMS room		
567	2022.11.11 Deposition of	Deposition Exhibit	A, M
	Misty Hampton - Exhibit		
	21 - Series of		
	photographs		
568	2022.11.11 Deposition of	Deposition Exhibit	M
	Misty Hampton - Exhibit		
	22 - Still shots from		
	DouglasNow YouTube		
	video		
569	2022.11.11 Deposition of	Deposition Exhibit	A
	Misty Hampton - Exhibit		
	23 -		
	EMS computer password		
570	2022.11.11 Deposition of	Deposition Exhibit	A, C
	Misty Hampton - Exhibit		
	24 -		
	Photograph, Coffee		
F 7 1	County GEMS password	D ': E 1:1:	N /
571	2022.11.11 Deposition of	Deposition Exhibit	M
	Misty Hampton - Exhibit 25 -		
	Photograph, (exterior		
	only) Lenberg - January		
	27, 28, 29		
572	2022.01.28 30(b)(6) SOS	Deposition Exhibit	NE, NR
	(Chris Harvey) - Exhibit		,
	1 - 1-26-		
	22, Curling Plaintiffs'		
	Second Amended Notice		
	of Deposition		
573	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit		
	2 -		
	LinkedIn profile re:		
	Chris Harvey		

Exh	Document Description	Document Type	Objection
it No			s
574	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit		
	3	D '4' E 1 1 4	T2 II
575	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit	Deposition Exhibit	F, H
	4 - State Defendants		
	101460 thru 461, 11-6-		
	20, E-mail string from		
	Chris Harvey to Frances		
	Watson		
	re: Violation.		
576	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit		
	5 - State Defendants		
	101471 thru 473, 11-10-		
	20, E-mail string		
	from Chris Harvey to Frances Watson re:		
	Security seals on		
	B.M.D.s.		
577	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit		,
	6 - State Defendants		
	108321, 10-10-20, E-mail		
	from David		
	Worley to Chris Harvey		
	re: Hall County.	D. W. Billion	D 11
578	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit 7 - State Defendants		
	108787 thru 788, 5-28-		
	20, E-mail string from		
	Chris Harvey to George		
	Gray re:		
	Board of Elections.		
579	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit		
	8 - State Defendants		
	110230 thru 231, 10-15-		

Exh	Document Description	Document Type	Objection s
	20, E-mail string from Carol Heard to Chris Harvey re: Threat assessment.		
580	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 9 - State Defendants 115480 thru 482, 10-30- 19, E-mail string from Deb Cox to Chris Harvey re: Encoding a supplemental voter.	Deposition Exhibit	F, H
581	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 10 - State Defendants 117430 thru 431, 2-25- 21, E-mail string Chris Harvey from Jordan Fuchs re: Security sensitive FW: Call follow-up.	Deposition Exhibit	F, H
582	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 11 - State Defendants 139190 thru 192, 4-5-19, E-mail string from Kevin Rayburn to Jordan Fuchs re: I bet I can hack your electronic voting machines.	Deposition Exhibit	F, H
583	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 12 - Fortalice 1209 thru 1212, 11-2-20, E-mail string from Chris Furtick to Roy Iversen re: Computer accessed remotely.	Deposition Exhibit	F, H

Exh	Document Description	Document Type	Objection
it No	_		s
584	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit		
	13 - Dominion 69648, 9-		
	25-20, Chris Harvey Post		
	to The Buzz re: Very		
	important announcement		
	concerning databases.		
585	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit		
	14 - Dominion 72216, 10-		
	19-20, E-mail from Scott		
	Tucker to list re: GA		
	advanced voting.		
586	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit		
	15 - Dominion 73354, 11-		
	8-20, E-mail string from		
	Kay Stimson to Jen		
	Daulby re: Voting issue		
	in Georgia.		
587	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H, M
	(Chris Harvey) - Exhibit		
	16 - Dominion 74766		
	thru 769, 11-17-20, E-		
	mail string from Chris		
	Harvey to Scott Tucker		
	and		
	David Greenwalt re:		
	Update to firewall rules		
	for Meraki MDM		
Z 00	for poll pads, attached.	D W D134	D II
588	2022.01.28 30(b)(6) SOS	Deposition Exhibit	F, H
	(Chris Harvey) - Exhibit		
	17 - Dominion 74784		
	thru 785, 11-17-20, E-		
	mail string from		
	Scott Tucker to Chris		
	Harvey re: memory cards		

Exh	Document Description	Document Type	Objection
589	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 18 - Dominion 76086	Deposition Exhibit	F, H
	thru 088, 1-7-21, E-mail string from Tom Feehan		
	to Blake Evans and Scott Tucker re:		
	We have a problem.		
590	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit 19 - State Defendants 2000997 thru 201000, 7- 16-19, E-mail string	Deposition Exhibit	F, H
	from Ryan Germany to Brad Raffensperger, Jordan Fuchs and		
	Merritt Beaver re: N.A.S.S. elections committee NormShield		
	press release/score card on State Web site security.		
591	2022.01.28 30(b)(6) SOS (Chris Harvey) - Exhibit	Deposition Exhibit	F, H
	20 - State Defendants 165630 thru 632, 12-31-		
	20, E-mail string from		
	Angelos Keromytis to Jordan		
	Fuchs re: Election machine hack?		
592	2022.01.28 30(b)(6) SOS	Deposition Exhibit	I, A, F, H
	(Chris Harvey) - CGG Exhibit 1 -		
	O.C.G.A. Section 21-2-		
	379.22 re: Requirements for electronic ballot		
	marking.		

Exh	Document Description	Document Type	Objection
it No			S
593	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 4 - 10-12-20, Reuters color photograph	Deposition Exhibit	A, F, H
	of presidential elections early voting at State Farm Arena.		
594	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 12 - Secure the Vote PowerPoint re: Precinct Layout to Aid with Privacy Training.	Deposition Exhibit	A, F, H
595	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 14 - 12-1-20, State of Georgia Official Election Bulletin from Chris Harvey to County election officials and county registrars re: Preserving ballot images and delivering to Sec. of State.	Deposition Exhibit	F, H
596	2022.01.28 30(b)(6) SOS (Chris Harvey) - CGG Exhibit 16 - Rockdale 924, 6-11-20, E-mail from Cynthia Willingham to Scott Tucker, Chris Harvey and Kevin Rayburn re: Additional training needed - tech and regional manager.	Deposition Exhibit	F, H, I
597	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 1 - 6- 30-22, Subpoena to	Deposition Exhibit	NE, H, F

	Document Description	Document Type	Objection
it No			S
	Produce Documents,		
	Information or Objects or		
	to Permit Inspection of		
	Premises in a Civil		
	Action to Eric B. Chaney		
	re: The above-captioned action.		
598	2022.08.15 Coffee County	Donosition Exhibit	NE
990	30(b)(6) Deposition (Eric	Deposition Exhibit	NE
	Chaney) - Exhibit 2 - 8-5-		
	22, Subpoena to Produce		
	Documents, Information		
	or		
	Objects or to Permit		
	Inspection of Premises in		
	a Civil Action to		
	Eric B. Chaney re: The		
	above-captioned action.		
599	2022.08.15 Coffee County	Deposition Exhibit	NE
	30(b)(6) Deposition (Eric	1	
	Chaney) - Exhibit 3 - 8-		
	14-22, Chaney Response		
	to CGG Subpoena for		
	Production of Documents		
	re: Curling v.		
	Kemp.		
600	2022.08.15 Coffee County	Deposition Exhibit	F, H
	30(b)(6) Deposition (Eric		
	Chaney) - Exhibit 4 -		
	State Defendants 202100		
	thru 103, 9- 28-21, State		
	of Georgia Secretary of		
	State,		
	Investigations Division		
	Summary re: Coffee		
001	County.	Danasitian E 1 112	0.104
601	2022.08.15 Coffee County	Deposition Exhibit	C, 104
	30(b)(6) Deposition (Eric		
	Chaney) - Exhibit 5 -		

	Document Description	Document Type	Objection
it No			S
	Color photograph of		
	computer/keyboard with		
000	Post-It note.	Danasitian Fabilit	TO II TO
602	2022.08.15 Coffee County	Deposition Exhibit	F, H, IS,
	30(b)(6) Deposition (Eric		M
	Chaney) - Exhibit 6 - Latham 24 thru 53,		
	Compilation		
	exhibit re: Coffee County		
	Board of Elections		
	documents.		
603	2022.08.15 Coffee County	Deposition Exhibit	F, H, M
003	30(b)(6) Deposition (Eric	Deposition Exhibit	1', 11, 111
	Chaney) - Exhibit 7 - 10-		
	6-20 thru 5-3-22, Coffee		
	County Board of		
	Elections and		
	Registration Regular		
	Monthly Meeting		
	Minutes.		
604	2022.08.15 Coffee County	Deposition Exhibit	F, H, I, M
	30(b)(6) Deposition (Eric		
	Chaney) - Exhibit 8 - 4-		
	12-22, E-mail string from		
	Jennifer Dorminey		
	Herzog to Ryan		
	Germany re: Response to		
	4-12-22 Emma Brown		
	Washington Post		
	inquiry.		
605	2022.08.15 Coffee County	Deposition Exhibit	C, F, H
	30(b)(6) Deposition (Eric		
	Chaney) - Exhibit 9 - 3-		
	15-18 thru 3-1-21, text		
	message string between		
	Eric Changy and Misty		
	Chaney and Misty		
	Hampton.		

Exh	Document Description	Document Type	Objection
it No			S
606	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 10 - 8122022-34 thru -53, 1-8- 21, E- mail string from Paul Maggio to Sidney Powell re: Jim Penrose-Coffee County GA forensics engagement agreement.	Deposition Exhibit	F, H, M
607	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 11 - 6- 3-22, ICS Advisory re: Vulnerabilities affecting Dominion Voting Systems ImageCast X.	Deposition Exhibit	C, F, H
608	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 12 - LinkedIn Web page print-out re: Robert A. Sinners.	Deposition Exhibit	F, H
609	2022.08.15 Coffee County 30(b)(6) Deposition (Eric Chaney) - Exhibit 13 - 12-12-20, Verified Petition for Emergency Injunctive and Declaratory Relief re: Still v. Raffensperger.	Deposition Exhibit	C, NE, H, F
610	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 1 - 8- 25-22 Subpoena to Testify At A Deposition in a Civil Action, Coffee	Deposition Exhibit	C, NE, H, F

	Document Description	Document Type	Objection
it No			S
	County Board of		
	Elections & Registration		
611	2022.09.01 Coffee County	Deposition Exhibit	I, OW, M
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 2 - 1-7-		
	21 and 1-8-21 Three		
	Screen Shots From Video		
	of Two Men Entering		
	Office		
	Carrying/Pulling Items		
612	2022.09.01 Coffee County	Deposition Exhibit	M, I, OW
	30(b)(6) Depsition		
	(Wendell		
	Stone) - Plaintiff's		
	Exhibit 3 - Screen Shots		
010	from Camera 1 1-7-21	B 111	- C - D - II
613	2022.09.01 Coffee County	Deposition Exhibit	C, F, H
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 4 - E-		
	mail Chain Ending with		
	Tuesday, May 11, 2021		
	3:30 PM E-mail, from		
	Watson, to		
	Jones, Subject: Fwd:		
C1 4	Coffee County	Denogition E-hibit	ъъ
614	2022.09.01 Coffee County	Deposition Exhibit	F, H
	30(b)(6) Depsition (Wondell Stone)		
	(Wendell Stone) - Plaintiff's Exhibit 5 - 5-6-		
	21 Dominion Voting, Customer Notification:		
	Maintaining Secure		
	Chain of Custody for		
	Your Dominion Voting		
	System,		
	CONFIDENTIAL,		
	CONTIDENTIAL,		

	Document Description	Document Type	Objection
it No			S
	STATE-DEFENDANTS- 00101937		
615	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 6 - A Series of Photographs Showing Compact Flash Cards with Handwritten Tags, Flash Drives, Etc., 08122022-000236-265	Deposition Exhibit	C, 104, IS, M
616	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 7 - Screen Shots from Camera 1 on 1-27-21 Through 1-29- 21	Deposition Exhibit	C, 104, IS, OW, I
617	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 8 - 1- 28-21 and 1-29-21 Screen Shots of Individuals Entering and Leaving the Elections Office	Deposition Exhibit	C, 104, IS, OW, I
618	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 9 - Two Photographs of Jeffrey Lenberg	Deposition Exhibit	C, 104, IS, OW, I

Exh	Document Description	Document Type	Objection
it No			S
619	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 10 - Composite Exhibit of Coffee County Board of Elections and Registration Board Meeting Minutes	Deposition Exhibit	F, H, M
620	Beginning with 10-6-20 2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 11 - 8/12/22 12:20 PM (GMT- 05:00) E-mail, from Chaney, to Thomas- Clark, et al., Subject: Coffee Co Board of Elections	Deposition Exhibit	F, H
621	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 12 - Typewritten Sheet Beginning: 3.4.22 (3) All documents, including communications; E-mail Chain Ending with Tuesday, 4-12-20 3:50 PM E-mail, from Herzog, to Germany, Subject: FW: Response to 4/12/22 Emma Brown Washington Post inquiry	Deposition Exhibit	A, C, F, H, M, I
622	2022.09.01 Coffee County 30(b)(6) Depsition (Wendell Stone) - Plaintiff's Exhibit 13 -	Deposition Exhibit	C, 104, IS, OW

	Document Description	Document Type	Objection
it No			S
	Photograph of Voyles and		
	Eric Chaney Sitting at a		
	Table with Laptop in		
	Elections		
000	Office C	D ': E 1:1:4	
623	2022.09.01 Coffee County	Deposition Exhibit	C, F, H, I,
	30(b)(6) Deposition		IS
	(Wendell Stone) - Plaintiff's Exhibit 14 -		
	Messages - Eric Chaney (With Hampton)		
	Beginning 3/15/18 7:40		
	PM		
624	2022.09.01 Coffee County	Deposition Exhibit	F, H
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 15 -		
	Messages - Andy Thomas		
	& Ernestine Thomas-		
	Clark & Eric Chaney &		
	Matthew McC & Wendell		
	Stone, Beginning with 1-		
	4-12 7:21 PM		
COF	Text	Danasitian Enhibit	E II IC
625	2022.09.01 Coffee County	Deposition Exhibit	F, H, IS, M
	30(b)(6) Depsition (Wendell Stone) -		IVI
	Plaintiff's Exhibit 16 - 2-		
	25-21 Resignation Letter,		
	from Ridlehoover, to		
	Board of Elections		
	Chairperson		
626	2022.09.01 Coffee County	Deposition Exhibit	F, H, IS,
	30(b)(6) Depsition		M
	(Wendell Stone) -		
	Plaintiff's Exhibit 17 - 2-		
	25-21 Resignation Letter,		
	from Hampton, to Board		
	of Elections Chairperson		

	Document Description	Document Type	Objection
it No			S
627	2022.09.01 Coffee County	Deposition Exhibit	C, F, H
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 18 -		
	Juha, Keskinen		
	(@MacFinn44),		
	TWITTER (Feb. 26,		
	2021, 6:05 PM) Twitter Post		
628		Denogition Exhibit	F, H,
040	2022.09.01 Coffee County	Deposition Exhibit	г, п, Unknown
	30(b)(6) Depsition (Wendell Stone) -		Ulikilowii
	Plaintiff's Exhibit 19 -		
	Text Message Between		
	Hampton and Rowell		
	(Withdrawn to Attorney-		
	Client		
	Privilege)		
629	2022.09.01 Coffee County	Deposition Exhibit	F, H
	30(b)(6) Depsition	· ·	,
	(Wendell Stone) -		
	Plaintiff's Exhibit 20 -		
	Message # 249 - From		
	Vickers, to Hampton,		
	Subject: FW		
	[EXTERNAL]Re:		
	Open Records Request		
630	2022.09.01 Coffee County	Deposition Exhibit	F, H, IS,
	30(b)(6) Depsition		M
	(Wendell Stone) -		
	Plaintiff's Exhibit 21 -		
	Summary, Dyanna		
	Hours		
	Claimed Period 11-16-20		
001	- 2-19-21	D D.1.1.	7.4
631	2022.09.01 Coffee County	Deposition Exhibit	M
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 22 -		

	Document Description	Document Type	Objection
it No			S
	Screen Shots from		
	Camera		
	1 1-8-21 Man Leaving		
	with Equipment		
632	2022.09.01 Coffee County	Deposition Exhibit	F, H
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 23 - E-		
	mail Chain Ending with		
	Thursday, 7-15-21 1:57		
	PM E-mail, from		
	Hampton, to		
	Vickers, Subject: Re:		
	Open Records Request		
633	2022.09.01 Coffee County	Deposition Exhibit	F, H, I
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 24 - 4-		
	12-22 Letter, to Marks,		
	from Herzog,		
	Consolidation of		
	Outstanding Open		
00.4	Records Requests	D D l	
634	2022.09.01 Coffee County	Deposition Exhibit	C, F, H, M
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 25 - 1-		
	8-21 3:48:30 PM E-mail,		
	from Maggio, to Powell,		
	Subject: RE: SSA1722:		
	Jim Penrose - Coffee		
	County GA Forensics Engagement Agreement		
	Engagement Agreement,		
COF	08122022-000034 - 53	Donosition Eulibit	БП
635	2022.09.01 Coffee County	Deposition Exhibit	F, H
	30(b)(6) Deposition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 26 -		
	11-30-20		

Exh	Document Description	Document Type	Objection
it No			S
	SullivanStrickler		
	Engagement Agreement		
	Forensic Analysis,		
	08122022-		
	000110 - 122		
636	2022.09.01 Coffee County	Deposition Exhibit	F, H, 104,
	30(b)(6) Depsition		IS
	(Wendell Stone) -		
	Plaintiff's Exhibit 27 -		
	SSA1722 HARD DRIVE		
	CONTENTS		
637	2022.09.01 Coffee County	Deposition Exhibit	C, F, H,
	30(b)(6) Depsition		104,
	(Wendell Stone) -		
	Plaintiff's Exhibit 28 -		
	Spreadsheet of E-mail		
	Addresses with Access to		
	Coffee County Data,		
	08122022- 000126-136		
638	2022.09.01 Coffee County	Deposition Exhibit	F, H, 104
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 29 -		
	Spreadsheet of IP		
	Addresses That Have		
	Downloaded Coffee		
	County Data,		
	08122022-000137-161		
639	2022.09.01 Coffee County	Deposition Exhibit	C, F, H
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Plaintiff's Exhibit 30 -		
	CISA - ICS Advisory		
	(ICSA-22-154-01)		
	Vulnerabilities Affecting		
	Dominion		
	Voting Systems		
	ImageCast X		

	Document Description	Document Type	Objection
it No.	2022.09.01 Coffee County	Deposition Exhibit	C, M, NE,
040	30(b)(6) Depsition	Deposition Exhibit	IS, F, H
	(Wendell Stone) -		10, 1, 11
	Plaintiff's Exhibit 31 -		
	12-17-20 Still v.		
	Raffensperger Lawsuit,		
	Verified Petition for		
	Emergency		
	Injunctive and		
	Declaratory Relief		
641	2022.09.01 Coffee County	Deposition Exhibit	H, F, NE
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Defendants' Exhibit 1 -		
	Ga Comp. R. & Regs.		
	183- 1-1204, 183-1-12-		
	.04. Storage,		
	Maintenance, and		
	Transport of Statewide		
	Voting System		
	Components		
642	2022.09.01 Coffee County	Deposition Exhibit	104, OW, I
	30(b)(6) Depsition		
	(Wendell Stone) -		
	Defendants' Exhibit 2 -		
	1-7-21 Screen Shots of		
	Men Entering Front Door of Elections Office with		
	Equipment		
643	2022.09.01 Coffee County	Deposition Exhibit	F, H, I
040	30(b)(6) Depsition	Deposition Exiting	1, 11, 1
	(Wendell Stone) -		
	Defendants' Exhibit 3 -		
	E-mail Chain Ending		
	with Friday, May 7, 2021		
	1:51:10 PM E-mail, from		
	Germany, to Feehan, et		
	al., Subject: RE:		
	[EXTERNAL] RE:		

	Document Description	Document Type	Objection
it No			S
	Dominion notice to		
	Customers re: Chain of		
	Custody, Ending		
	Dominion 089394		
644	9.29.2021 Deposition of	Deposition Exhibit	NE, NR
	Ricardo Davis - Exhibit 1		
	- Notice		
	of Deposition		
645	9.29.2021 Deposition of	Deposition Exhibit	F, H, NE
	Ricardo Davis - Exhibit 2		
	- D 1 4: Dil 1		
	Declaration Filed		
0.10	10/23/19	D D.1.1.	DII
646	9.29.2021 Deposition of	Deposition Exhibit	F, H
	Ricardo Davis - Exhibit 3		
	- Mr.		
647	Davis voting record	Danasitian Eulibit	NIE NID
047	9.23.2021 Deposition of	Deposition Exhibit	NE, NR
	Laura Digges - Exhibit 1 - Notice		
	of Deposition		
648	9.23.2021 Deposition of	Deposition Exhibit	F, H
040	Laura Digges - Exhibit 2	Deposition Eximate	1, 11
	- CBS46 News article		
649	9.23.2021 Deposition of	Deposition Exhibit	NE, F, H
0 10	Laura Digges - Exhibit 3	2 oposition Emilion	
	- CGG's		
	and Coalition'sObjections		
	and Responses to		
	Raffensperger's First		
	Req. for Admissions		
650	9.23.2021 Deposition of	Deposition Exhibit	F, H
	Laura Digges - Exhibit 4		
	- ENET		
	Report		
651	9.23.2021 Deposition of	Deposition Exhibit	NE, NR
	William Digges III -		
	Exhibit 1 -		
	Notice of Deposition		

Exh	Document Description	Document Type	Objection
it No			s
652	9.23.2021 Deposition of William Digges III - Exhibit 2 -	Deposition Exhibit	F, H
	ENET Report		
653	9.23.2021 Deposition of William Digges III - Exhibit 3 - Coalition Statement on William Diggs	Deposition Exhibit	F, H, M, NE
654	9.23.2021 Deposition of William Digges III - Exhibit 4 - Declaration of William Diggs, III dated October 20, 2019	Deposition Exhibit	F, H, NE
655	9.23.2021 Deposition of William Digges III - Exhibit 5 - Bullet Point Sheet	Deposition Exhibit	F, H, NE
656	6.28.2019 Deposition of Jennifer Doran - Exhibit 32 - Subpoena	Deposition Exhibit	NE, M
657	6.28.2019 Deposition of Jennifer Doran - Exhibit 33 - Direct Record Electronic Voting Machine Recap	Deposition Exhibit	F, H, IS
658	6.28.2019 Deposition of Jennifer Doran - Exhibit 34 - Ballot Image Report	Deposition Exhibit	A, F, H
659	6.28.2019 Deposition of Jennifer Doran - Exhibit 35 - Official Election Bulletin	Deposition Exhibit	F, H
660	6.28.2019 Deposition of Jennifer Doran - Exhibit 36 - 11.26.2018 General	Deposition Exhibit	H, F

Exh	Document Description	Document Type	Objection s
	Election Undervote Information		
661	6.28.2019 Deposition of Jennifer Doran - Exhibit 37 - Rockdale County Board of Election Voting Equipment Issues	Deposition Exhibit	H, F
662	9.22.2022 Deposition of Dean Felicetti - Exhibit 1 - Subpoena to Testify at a Civil Action	Deposition Exhibit	C, H, F, NE, M
663	9.22.2022 Deposition of Dean Felicetti - Exhibit 2 - Picture of Jim Nelson, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit	C, OW
664	9.22.2022 Deposition of Dean Felicetti - Exhibit 3 - Picture of Jennifer Jackson, Senior System Enngineer at Sullivan Strickler LLC	Deposition Exhibit	C, OW
665	9.22.2022 Deposition of Dean Felicetti - Exhibit 4 - Picture of Karuna Naik, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit	C, H, F, OW
666	9.22.2022 Deposition of Dean Felicetti - Exhibit 5 - Picture of Paul Maggio, Senior System Engineer at Sullivan Strickler LLC	Deposition Exhibit	C, OW
667	9.22.2022 Deposition of Dean Felicetti - Exhibit 6	Deposition Exhibit	C, H, F

Exh	Document Description	Document Type	Objection s
	- Engagement Agreement, November 30, 2020		~
668	9.22.2022 Deposition of Dean Felicetti - Exhibit 7 - Engagement Agreement, MI AZ, December 6, 2020	Deposition Exhibit	C, H, F
669	9.22.2022 Deposition of Dean Felicetti - Exhibit 8 - January 8, 2021 Maggio email chain invoice	Deposition Exhibit	C, H, F
670	9.22.2022 Deposition of Dean Felicetti - Exhibit 9 - Phone text message, 8.12.2022	Deposition Exhibit	C, H, F, IS, I
671	9.22.2022 Deposition of Dean Felicetti - Exhibit 10 - Coffee County Board of Educations and Registration Elections Office Security Video, 1.7.2021	Deposition Exhibit	C, I, IS, OW
672	9.22.2022 Deposition of Dean Felicetti - Exhibit 11 - January 8, 2021 From 5pm to 6pm missing video	Deposition Exhibit	C, I, IS, OW
673	9.22.2022 Deposition of Dean Felicetti - Exhibit 12 - Bates Numbers 08122022 to 265	Deposition Exhibit	C, I, IS, OW
674	9.22.2022 Deposition of Dean Felicetti - Exhibit 13 -	Deposition Exhibit	C, H, F, M

Exh	Document Description	Document Type	Objection
it No			S
	Password Memos,		
	08122022 - 000123		
	through 125		Q 11 T 10
675	9.22.2022 Deposition of	Deposition Exhibit	C, H, F, IS
	Dean Felicetti - Exhibit		
	14 -		
	Maggio hard drive		
070	contents (screenshots)	Danasitian Enhibit	C II E IC
676	9.22.2022 Deposition of Dean Felicetti - Exhibit	Deposition Exhibit	C, H, F, IS
	15 - 8.17.2022 Maggio Production (Triage		
	reports) Folder		
	Structure		
677	9.22.2022 Deposition of	Deposition Exhibit	C, H, F, IS
	Dean Felicetti - Exhibit	Deposition Exhibit	0, 11, 1, 10
	16 - Bates		
	No.s 08122022-000126		
	through 136		
678	9.22.2022 Deposition of	Deposition Exhibit	C, H, F, IS
	Dean Felicetti - Exhibit	_	
	17 - Bates		
	No.s 08122022-000137		
	through 161		
679	9.22.2022 Deposition of	Deposition Exhibit	C, H, F
	Dean Felicetti - Exhibit		
	18 - Bates		
	No.s 08122022-000175		
000	through 176	D. W. D.L.	O II P 35
680	9.22.2022 Deposition of	Deposition Exhibit	C, H, F, M
	Dean Felicetti - Exhibit		
	19 - Bates		
	No.s 08122022-000098		
681	through 105	Donosition Exhibit	СНБ
001	9.22.2022 Deposition of Dean Felicetti - Exhibit	Deposition Exhibit	C, H, F, M,
	20 - Bates		Unknown
	No.s 08122022-000204		
	through 205		
	umougn 200		

Exh	Document Description	Document Type	Objection
it No			S
682	9.22.2022 Deposition of	Deposition Exhibit	C, H, F, IS
	Dean Felicetti - Exhibit		
	21 - Bates		
	No.s 08122022-		
000	000205.XLSX	B 1.1	
683	9.22.2022 Deposition of	Deposition Exhibit	C, H, F
	Dean Felicetti - Exhibit		
	22 - Bates		
	No.s 08122022-000022 through 33		
684	9.22.2022 Deposition of	Deposition Exhibit	C, H, F,
004	Dean Felicetti - Exhibit	Deposition Exhibit	M, IS
	23 -		101, 10
	Maggio-000057 58 Excel		
685	9.22.2022 Deposition of	Deposition Exhibit	C, H, F, M
	Dean Felicetti - Exhibit	Beposition Emiliate	O, 11, 1 , 111
	24 May 7,		
	2021 Barnes e-mail chain		
	re: Cyber Ninjas		
686	9.22.2022 Deposition of	Deposition Exhibit	C, H, F,
	Dean Felicetti - Exhibit		NE, I
	25 -		
	Subpoena		
687	9.22.2022 Deposition of	Deposition Exhibit	C, H, F
	Dean Felicetti - Exhibit		
	26 State		
0.0.	Defendants-001 01937	D D	
688	9.22.2022 Deposition of	Deposition Exhibit	C, H, F
	Dean Felicetti - Exhibit		
	27 - ICS Advisory (ICSA-		
	22-154-01)		
	Vulnerabilities Affecting		
	Dominion Voting Systems ImageCast Y		
689	Systems ImageCast X 9.22.2022 Deposition of	Deposition Exhibit	C, OW, H,
009	Dean Felicetti - Exhibit	Deposition Exhibit	F C, OW, H,
	28 Copy		*
	of Check to Defendant the Republic		

Exh	Document Description	Document Type	Objection
it No			S
690	2022.11.22 Deposition of		NE, H, F
	Alex Cruce - Exhibit 1 -		
	Subpoena		
691	2022.11.22 Deposition of		F, H, I
	Alex Cruce - Exhibit 2 -		
	Email		
	with Slogs from Misty		
	Hampton, dated January		
	7, 2021		
692	2022.11.22 Deposition of		M, IS
	Alex Cruce - Exhibit 3 -		
	Color		
	photographs		
693	2022.11.22 Deposition of		H, F
	Alex Cruce - Exhibit 4 -		
	Binnall		
	Maggio Engagement		
	Letter		
694	2022.11.22 Deposition of		H, F
	Alex Cruce - Exhibit 5 -		
	Washington Post Inquiry		
695	2022.11.22 Deposition of		H, F
	Alex Cruce - Exhibit 6 -		
	Recording Trancript		
696	2022.11.22 Deposition of		H, F, M
	Alex Cruce - Exhibit 7 -		
	OCR		
	Additional Documents		
697	2022.01.19 Deposition of		NE, H, F,
	Donna Curling - Exhibit		NR
	1 -		
	Amended Notice of		
	Deposition		
698	2022.01.19 Deposition of		H, F, NE
	Donna Curling - Exhibit		
	3 - Declaration of Donna		
	Curling in Support of		
	Curling Plaintiffs'		

Exh	Document Description	Document Type	Objection
it No			S
	Motion for Preliminary		
	Injunction		
699	2022.01.19 Deposition of		H, F, NE
	Donna Curling - Exhibit		
	7 - Verified Complaint for		
	Declaratory Relief,		
	Injunctive		
	Relief, and Writ of		
	Mandamus		
700	2022.01.19 Deposition of		H, F,NE
	Donna Curling - Exhibit		
	8 -		
	Third Amended		
-01	Complaint		
701	2022.01.19 Deposition of		
	Donna Curling - Exhibit		
	9.		
	Email Chain (CURLING-		
700	0006817 - 0006818)		
702	2022.01.19 Deposition of		
	Donna Curling - Exhibit 10 -		
	Email Chain (CURLING-		
	0010237 - 0010239)		
703	2022.01.19 Deposition of		H, F
100	Donna Curling - Exhibit		11, 1
	11 -		
	Email chain (CURLING-		
	0010015 - 0010023)		
704	2022.01.19 Deposition of		H, F
	Donna Curling - Exhibit		,
	12 -		
	Email chain (CURLING-		
	0010166 - 0010180)		
705	2022.01.19 Deposition of		NE
	Donna Curling - Exhibit		
	14 - Curling		
	Plaintiffs'Responses and		
	Objections to Ahn Le's		

Exh	Document Description	Document Type	Objection
it No			S
	First		
	Interrogatories to Donna		
	Curling, Donna Price,		
	and Jeffrey Schoenberg		
706	2022.01.19 Deposition of		NE
	Donna Curling - Exhibit		
	15 - Curling Plaintiffs'		
	Responses to Defendant		
	Brad Raffensperger's		
	First		
	Requests For Admission		
707	2022.01.19 Deposition of		NE
	Donna Curling - Exhibit		
	16 -		
	Declaration of Donna P.		
	Curling in Support of		
	Motion for Preliminary		
	Injunction		
708	8.25.2022 Deposition of		H, F
	Benjamin R. Cotton -		
	Exhibit 1 -		
	Linked In Profile of Ben		
	Cotton		
709	8.25.2022 Deposition of		H, F, NE
	Benjamin R. Cotton -		
	Exhibit 2 - Letter from		
	Andrew Parker to Mary		
	Kaiser, and others,		
710	dated 8.24.2022		11 12
710	8.25.2022 Deposition of		H, F
	Benjamin R. Cotton -		
	Exhibit 3 - Letter from		
	Andrew Parker to Mary		
	Kaiser dated 8.19.2022		
711			цг
711	8.25.2022 Deposition of		H, F
	Benjamin R. Cotton - Exhibit 4 - Article		
	entitled: Pro-Trump Tech		

	Document Description	Document Type	Objection
it No			S
	Team Copied Georgia		
	Election Data, Records		
	Show		
712	8.25.2022 Deposition of		H, F
	Benjamin R. Cotton -		
	Exhibit 5 -		
	1.8.2021 Paul Maggio		
	email chain and invoice		
713	8.25.2022 Deposition of		M
	Benjamin R. Cotton -		
	Exhibit 6 - Key Photos		
	from Maggio Production		
714	8.25.2022 Deposition of		F, A, H
	Benjamin R. Cotton -		
	Exhibit 7 -		
	8.12.2022 Maggio Hard		
	Drive Contents		
715	8.25.2022 Deposition of		F, A, H
	Benjamin R. Cotton -		
	Exhibit 8 -		
	8.12.2022 Email		
	addresses with access to		
	CC data		
716	8.25.2022 Deposition of		H, F
	Benjamin R. Cotton -		
	Exhibit 9 -		
	4.22.2021 Email, Greg		
	Freemyer - no		
	involvement		
717	8.25.2022 Deposition of		M, H, F
	Benjamin R. Cotton -		
	Exhibit 10 - Email chain,		
	Coffee County Forensics		
	FedEx to Lambert		
718	8.25.2022 Deposition of		NE, H, F
	Benjamin R. Cotton -		
	Exhibit 11 - Cotton		
	Excerpt, 7.21.2022		

	Document Description	Document Type	Objection
it No			S
	Motion Hearing, Lake v.		
7 10	Hobbs		NE II E
719	8.25.2022 Deposition of		NE, H, F
	Benjamin R. Cotton -		
	Exhibit 12 - Declaration		
	of Benjamin R, Cotton in		
700	Lake v. Hobbs		II I
720	8.25.2022 Deposition of		H, F
	Benjamin R. Cotton -		
	Exhibit 13 -		
	5.7.2021 Barnes email		
721	chain re: Cyber Ninjas		пъ
121	8.25.2022 Deposition of		H, F,
	Benjamin R. Cotton -		
	Exhibit 14 - Georgia, Secretatary of State,		
	News and		
	Announcements,		
	1.27.2022		
722	8.25.2022 Deposition of		H, F
122	Benjamin R. Cotton -		11, 1
	Exhibit 15 -		
	ICS Advisory (ICSA-22-		
	154-01) 6.4.22, 3:21 p.m.		
723	8.25.2022 Deposition of		H, F, NE
	Benjamin R. Cotton -		, ,
	Exhibit 16 -		
	7.13.2021 Corrected		
	Exhibit B - 7.12		
	Declaration of J. Alex		
	Halderman		
724	8.25.2022 Deposition of		H, F
	Benjamin R. Cotton -		
	Exhibit D1		
	- Exhibit D to Cotton		
	First Declaration - EAC		
	Inv Report Williamson		
	County, TN		

Exh	Document Description	Document Type	Objection
it No	_	, <u>, , , , , , , , , , , , , , , , , , </u>	S
725	8.25.2022 Deposition of		H, F, NE
	Benjamin R. Cotton -		
	Exhibit D2		
	- Exhibit F to Cotton's		
	First Declaration -		
	Halderman Dec.		
	2020.08.19		
726	8.25.2022 Deposition of		H, F, NE
	Benjamin R. Cotton -		
	Exhibit D3		
	- Exhibit G to Cotton		
	First Declaration -		
	Halderman Rebuttal		
	Declaration		
727	State Defendants'	State Defendants' Statement	H, F
	Statement of Undisputed	of Unidsputed Material Facts	
	Material Facts Exhibit 1		
	- AJC Article: High-Tech		
	Voting Due November		
728	State Defendants'	State Defendants' Statement	H, F
	Statement of Undisputed	of Unidsputed Material Facts	
	Material Facts		
	Exhibit 2 - The National		
	Academies Press:		
	Securing the Vote		
	Protecting American		
	Democracy		
729	State Defendants'	State Defendants' Statement	H, F, NE
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 3 - Declaration of		
	Ryan Germany		TT TO 3.7-
730	State Defendants'	State Defendants' Statement	H, F, NE
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 4 - Declaration of		
	Dr. Eric Coomer		

Exh	Document Description	Document Type	Objection s
731	State Defendants' Statement of Undisputed Material Facts Exhibit 5 - Declaration of Dr. Juan Gilbert	State Defendants' Statement of Unidsputed Material Facts	H, F, NE
732	State Defendants' Statement of Undisputed Material Facts Exhibit 6 - SOS DRE Decertification Order	State Defendants' Statement of Unidsputed Material Facts	
733	State Defendants' Statement of Undisputed Material Facts Exhibit 7 - Coalition Pltfs Motion to Sever	State Defendants' Statement of Unidsputed Material Facts	NE
734	State Defendants' Statement of Undisputed Material Facts Exhibit 8 - Coalition Pltfs Motion to Sever Brief ISO	State Defendants' Statement of Unidsputed Material Facts	NE
735	State Defendants' Statement of Undisputed Material Facts Exhibit 9 - Curling Pltfs Notice of Joinder in Coalition's Motion to Sever	State Defendants' Statement of Unidsputed Material Facts	NE
736	State Defendants' Statement of Undisputed Material Facts Exhibit 10 - Curling Pltfs Reply in Support of Motion to Sever	State Defendants' Statement of Unidsputed Material Facts	NE
737	State Defendants' Statement of Undisputed Material Facts Exhibit 11 - Hearing Transcript for 11/19/21	State Defendants' Statement of Unidsputed Material Facts	NE, H, F

Exh	Document Description	Document Type	Objection
it No		V 2	s
738	State Defendants'	State Defendants' Statement	NE, H, F
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 12 - Declaration		
	of Mark Riccobono		
739	State Defendants'	State Defendants' Statement	NE, T, H,
	Statement of Undisputed	of Unidsputed Material Facts	F
	Material Facts Exhibit		
	13 - Deposition		
	Transcript of Teresa		
	Lynn Ledford		
740	State Defendants'	State Defendants' Statement	NE, H, F
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 14 - Hearing		
	Transcript for 7/26/19)
741	State Defendants'	State Defendants' Statement	NE, H, F
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 15 - Declaration		
742	of Chris Harvey State Defendants'	State Defendants' Statement	NE HE
144	State Defendants Statement of Undisputed	of Unidsputed Material Facts	NE, H, F, T
	Material Facts	or Omusputed Material Facts	1
	Exhibit 16 - Deposition		
	Transcript of Donna		
	Curling (1/19/22)		
743	State Defendants'	State Defendants' Statement	NE
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 17 - Curling		
	Amended Complaint		
744	State Defendants'	State Defendants' Statement	F, H, A
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 18 - Donna		
	Curling ENET Report		

	Document Description	Document Type	Objection
it No			S
745	State Defendants'	State Defendants' Statement	C,
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 19 - Donna		
	Curling email from 10/20/20		
746	State Defendants'	State Defendants' Statement	NE, H, F,
140	Statement of Undisputed	of Unidsputed Material Facts	T
	Material Facts Exhibit	or omaspated material racts	
	20 - Deposition		
	Transcript of Donna		
	Price (3/8/22)		
747	State Defendants'	State Defendants' Statement	F, H, A
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 21 - Donna Price		
= 40	ENET Report		\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
748	State Defendants'	State Defendants' Statement	NE, H, F,
	Statement of Undisputed Material Facts	of Unidsputed Material Facts	T
	Exhibit 22 - Deposition		
	Transcript of Jeffrey		
	Schoenberg (10/19/21)		
749	State Defendants'	State Defendants' Statement	F, H, A
	Statement of Undisputed	of Unidsputed Material	, ,
	Material Facts	Facts	
	Exhibit 23 - Jeffrey		
	Schoenberg ENET		
	Report		
750	State Defendants'	State Defendants' Statement	F, H, A
	Statement of Undisputed	of Unidsputed Material Facts	
	Material Facts Exhibit		
	24 - Jeffrey Schoenberg		
751	Absentee ENET Report State Defendants'	State Defendants' Statement	NE HE
191	Statement of Undisputed	of Unidsputed Material	NE, H, F, T
	Material Facts	Facts	_
	Exhibit 25 - CGG 30(b)(6)	1 4000	
	Deposition Transcript		

Exh	Document Description	Document Type	Objection
it No			S
752	State Defendants'	State Defendants' Statement	NE, H, F
	Statement of Undisputed	of Unidsputed Material Facts	
	Material Facts		
	Exhibit 26 - Coalition		
	Third Amended		
	Complaint		
753	State Defendants'	State Defendants' Statement	NE, H, F
	Statement of Undisputed	of Unidsputed Material Facts	
	Material Facts Exhibit		
	27 - Coalition Brief in		
	Support of Motion for PI		
754	State Defendants'	State Defendants' Statement	NE, H, F,
	Statement of Undisputed	of Unidsputed Material	T
	Material Facts	Facts	
	Exhibit 28 - Deposition		
	Transcript of Laura		
	Digges		
755	State Defendants'	State Defendants' Statement	F, H, A
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 29 - Laura		
	Digges ENET Report		
756	State Defendants'	State Defendants' Statement	NE, H, F,
	Statement of Undisputed	of Unidsputed Material Facts	T
	Material Facts Exhibit		
	30 - Deposition		
	Transcript of William		
	Digges III		
757	StateDefendants'	State Defendants' Statement	NE
	Statement of Undisputed	of Unidsputed Material Facts	
	Material Facts Exhibit		
	31 - Coalition Pltfs		
	Statement on William		
	Digges		
758	StateDefendants'	State Defendants' Statement	F, H, A
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 32 - William		
	Digges III ENET Report		

Exh	Document Description	Document Type	Objection
it No			S
759	State Defendants'	State Defendants' Statement	NE, H, F,
	Statement of Undisputed	of Unidsputed Material Facts	${f T}$
	Material Facts Exhibit		
	33 - Deposition		
	Transcript of Ricardo		
	Davis		
760	State Defendants'	State Defendants' Statement	F, H, A
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 34 - Ricardo		
	Davis ENET Report		
761	State Defendants'	State Defendants' Statement	NE, H, F,
	Statement of Undisputed	of Unidsputed Material Facts	${f T}$
	Material Facts Exhibit		
	35 - Deposition		
	Transcript of Megan		
700	Missett		T II A
762	State Defendants'	State Defendants' Statement	F, H, A
	Statement of Undisputed	of Unidsputed Material	
	Material Facts Exhibit 26 Magan	Facts	
	Exhibit 36 - Megan Missett ENET Report		
763	Missett ENET Report State Defendants'	State Defendants' Statement	F, H, A
100	Statement of Undisputed	of Unidsputed Material Facts	1', 11, A
	Material Facts Exhibit	of Officeputed Material Pacts	
	37 - The Georgia Risk-		
	Limiting Audit/Hand		
	Tally:		
	A Carter Center		
	Observation Report		
764	State Defendants'	State Defendants' Statement	F, H, A
	Statement of Undisputed	of Unidsputed Material Facts	
	Material Facts Exhibit	_	
	38 - The Carter Center		
	Preliminary Statement		
	on Georgia's November		
	2022 Risk-Limiting Audit		
	Process		

Exh	Document Description	Document Type	Objection
765	State Defendants' Statement of Undisputed Material Facts Exhibit 39 - SOS Risk- Limiting Audit Report	State Defendants' Statement of Unidsputed Material Facts	F, H, A
766	State Defendants' Statement of Undisputed Material Facts Exhibit 40 - Curling Plaintiffs' Responses to Defendant Brad Raffensperge's First RFA	State Defendants' Statement of Unidsputed Material Facts	NE
767	State Defendants' Statement of Undisputed Material Facts Exhibit 41 - MITRE Report	State Defendants' Statement of Unidsputed Material Facts	NP, H, NR, 403, A, F
768	State Defendants' Statement of Undisputed Material Facts Exhibit 42 - Declaration of Phillip Stark (3/9/22)	State Defendants' Statement of Unidsputed Material Facts	H, F, NE
769	State Defendants' Statement of Undisputed Material Facts Exhibit 43 - Phillip Stark Resignation Letter	State Defendants' Statement of Unidsputed Material Facts	NR, H, F
770	State Defendants' Statement of Undisputed Material Facts Exhibit 44 - Declaration of Phillip Stark (12/5/22)	State Defendants' Statement of Unidsputed Material Facts	H, F, NE
771	State Defendants' Statement of Undisputed Material Facts Exhibit 45 - Deposition Transcript of Dr. Phillip Stark	State Defendants' Statement of Unidsputed Material Facts	H, F, NE, T

	Document Description	Document Type	Objection
it No		Chata Dafa da la stat Chata sa sa t	S
772	State Defendants'	State Defendants' Statement	H, F,
	Statement of Undisputed Material Facts	of Unidsputed Material Facts	
	Exhibit 46 - CURLING-	racts	
	0010015-0010023		
773	State Defendants'	State Defendants' Statement	H, F
' ' '	Statement of Undisputed	of Unidsputed Material	11, 1
	Material Facts	Facts	
	Exhibit 47 - CURLING-		
	0010127-0010135		
774	State Defendants'	State Defendants' Statement	H, F
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 48 - CURLING-		
	0010142-0010152		
775	State Defendants'	State Defendants' Statement	H, F
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 49 - CURLING-		
770	0010153-0010165	State Defendental Statement	пъ
776	State Defendants'	State Defendants' Statement	H, F
	Statement of Undisputed Material Facts	of Unidsputed Material Facts	
	Exhibit 50 - CURLING-	racts	
	0010166-0010180		
777	State Defendants'	State Defendants' Statement	H, F
	Statement of Undisputed	of Unidsputed Material	-
	Material Facts	Facts	
	Exhibit 51 - CURLING-		
	0010181-0010184		
778	State Defendants'	State Defendants' Statement	H, F
	Statement of Undisputed	of Unidsputed Material	
	Material Facts	Facts	
	Exhibit 52 - Auditing		
770	Indian Elections Article	Chata Da Carla La Li Chata	II II NIII
779	State Defendants'	State Defendants' Statement	H, F, NE
	Statement of Undisputed Material Facts	of Unidsputed Material	
	Material Facts	Facts	

Exh	Document Description	Document Type	Objection s
	Exhibit 53 - PI Hearing Transcript (9/10/20)		
780	State Defendants' Statement of Undisputed Material Facts Exhibit 54 - Securing the Vote: Protecting American Democracy	State Defendants' Statement of Unidsputed Material Facts	H, F
781	State Defendants' Statement of Undisputed Material Facts Exhibit 55 - Third Supplemental Declaration of Philip Stark	State Defendants' Statement of Unidsputed Material Facts	H, F, NE
782	State Defendants' Statement of Undisputed Material Facts Exhibit 56 - Deposition Transcript of Kevin Skoglund	State Defendants' Statement of Unidsputed Material Facts	H, F, NE, T
783	State Defendants' Statement of Undisputed Material Facts Exhibit 57 - Deposition Transcript of Dr. Halderman (11/17/21)	State Defendants' Statement of Unidsputed Material Facts	H, F, NE, T
784	State Defendants' Statement of Undisputed Material Facts Exhibit 58 - Deposition Transcript of Dr. Halderman (1/3/23)	State Defendants' Statement of Unidsputed Material Facts	H, F, NE, T
785	State Defendants' Statement of Undisputed Material Facts Exhibit 59 - Expert	State Defendants' Statement of Unidsputed Material Facts	H, F, NE

	Document Description	Document Type	Objection
it No			S
	Report of Dr. Andrew		
	Appel		
786	State Defendants'	State Defendants' Statement	H, F, NE,
100	Statement of Undisputed	of Unidsputed Material Facts	TI, F, NE,
	Material Facts Exhibit	of Officeputed Material Facts	1
	60 - Deposition		
	Transcript of Dr. Andrew		
	Appel		
787	Declaration of J. Alex	Plaintiffs' Exhibits in Support	H, F, NE
	Halderman In Support of	of Opposition to	, ,
	Motion for	Defendants' Motions for	
	Preliminary Injunction	Summary Judgment Exhibit	
	(Aug. 8, 2018)	1	
788		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration of Richard A.	Motions for Summary	
	DeMillo (Sept. 9, 2018)	Judgment Exhibit 3	
789		Plaintiffs' Exhibits in Support	H, F, NE
	Declaration of J. Alex	of Opposition to Defendants'	
	Halderman (Sept. 1,	Motions for Summary	
700	2020)	Judgment Exhibit 4	H E NE
790	Transcript of Michael Ion	Plaintiffs' Exhibits in Support of Opposition to Defendants'	H, F, NE, T
	Transcript of Michael Ian Shamos, Ph.D., J.D. depo	Motions for Summary	1
	(July 19, 2019)	Judgment Exhibit 5	
791	Black Box Voting -	Plaintiffs' Exhibits in Support	H, F,
	Diebold TSx Evaluation,	of Opposition to Defendants'	-, - ,
	Security Alert (May 11,	Motions for Summary	
	2006)	Judgment Exhibit 6	
792		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration of Duncan A.	Motions for Summary	
	Buell (Aug. 7, 2018)	Judgment Exhibit 7	
793	Paper: Security Analysis	Plaintiffs' Exhibits in Support	H, F
	of the Diebold AccuVote-	of Opposition to Defendants'	
	TS Voting Machine	Motions for Summary	
	(Sept. 13, 2006)	Judgment Exhibit 8	

	Document Description	Document Type	Objection
it No			S
794	Meeting Minutes on	Plaintiffs' Exhibits in Support	H, F
	Electronic Voting System	of Opposition to Defendants'	
	Security - House of	Motions for Summary	
	Representatives	Judgment Exhibit 9	
	Committee on House		
	Administration (July 7,		
	2004)		
795		Plaintiffs' Exhibits in Support	H, F, NE,
	Transcript of Michael	of Opposition to Defendants'	${f T}$
	Barnes depo (June 27,	Motions for Summary	
	2019)	Judgment Exhibit 10	
796		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration of Michael	Motions for Summary	
	Barnes (July 10, 2019)	Judgment Exhibit 11	
797	Powerpoint from	Plaintiffs' Exhibits in Support	H, F, A
	Kennesaw State	of Opposition to Defendants'	
	University Center for	Motions for Summary	
	Election Systems on The	Judgment Exhibit 12	
	Georgia Voting System		
	(Feb. 2014)		
798	Order - Denying Plfs'	Plaintiffs' Exhibits in Support	NE, H, F
	Motions for Preliminary	of Opposition to Defendants'	
	Injunction (Sept. 17,	Motions for Summary	
	2018)	Judgment Exhibit 13	
799		Plaintiffs' Exhibits in Support	NE, H, F
		of Opposition to Defendants'	
	Declaration of Logan	Motions for Summary	
0.7.7	Lamb (Aug. 3, 2018)	Judgment Exhibit 14	\
800		Plaintiffs' Exhibits in Support	NE, H, F
	A 00: 1	of Opposition to Defendants'	
	Affidavit of Logan Lamb	Motions for Summary	
001	(June 30, 2017)	Judgment Exhibit 15	N (T) A T
801	News Article from	Plaintiffs' Exhibits in Support	M, F, A, H
	Kennesaw State	of Opposition to Defendants'	
	University regarding the	Motions for Summary	
	Center for Election	Judgment Exhibit 16	
	Systems (Mar. 21, 2017)		

Exh	Document Description	Document Type	Objection
it No		01	s
	Emails with KSU individuals		
802	Email chain between Merle Steven King and Michael Barnes RE: Re: Follow Up from earlier email regarding security of elections.kennesaw.edu (Aug. 29, 2016)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 17	H, F
803	Supplemental Declaration of Logan Lamb (Jan. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 18	H, F, NE
804	Email chain between Michael Barnes and Stephen Craig Gay RE: Request for data retrieval (Mar. 17, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 19	H, F
805	Email confirmation of delivery to State Election Board, sent from Scott Holcomb to Curling Plfs (July 6, 2016)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 20	H, F, 104
806	Email chain between Christopher Dehner and Davide Gaetano RE: CES Network Assessment Meeting Notes 6/26 (July 19, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 21	H, F
807	Email chain between Christopher Dehner and Stephen Gay Re: CES server surplus (Aug. 9, 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 23	H, F

Exh	Document Description	Document Type	Objection
it No			S
808	News Article from AP	Plaintiffs' Exhibits in Support	H, F
	News re: Georgia election	of Opposition to Defendants'	
	server wiped after suit	Motions for Summary	
	filed (Oct. 26, 2017)	Judgment Exhibit 25	
809	TRANSCRIPT OF	Plaintiffs' Exhibits in Support	H, F, NE
	EVIDENTIARY	of Opposition to Defendants'	
	HEARING	Motions for Summary	
	PROCEEDINGS (Sept.	Judgment Exhibit 26	
	12, 2018)		
810	DECLARATION OF J.	Plaintiffs' Exhibits in Support	H, F, NE,
	ALEX HALDERMAN IN	of Opposition to Defendants'	M
	SUPPORT OF	Motions for Summary	
	CURLING PLAINTIFFS'	Judgment Exhibit 27	
	RESPONSE TO STATE		
	DEFENDANTS'		
	REQUEST FOR		
	STATUS CONFERENCE		
	AND NOTICE OF		
	DECERTIFICATION OF		
	GEMS/DRE SYSTEM		
	AND CURLING		
	PLAINTIFFS' REQUEST		
	FOR HEARING (Jan. 8,		
	2020)		
811	Instructions on Creating	Plaintiffs' Exhibits in Support	H, F, M
	and Saving Export File	of Opposition to Defendants'	
	in GEMS - Transferring	Motions for Summary	
	Files from FireZilla for	Judgment Exhibit 28	
	Election Day by		
	Kennesaw State		
	University Center for		
0.1.	Election Systems		TT TO 3.7-
812	TRANSCRIPT OF	Plaintiffs' Exhibits in Support	H, F, NE
	EVIDENTIARY	of Opposition to Defendants'	
	HEARING	Motions for Summary	
	PROCEEDINGS (July	Judgment Exhibit 29	
	25, 2019)		

	Document Description	Document Type	Objection
it No			S
813	Transcript of James Oliver depo (Jan. 17, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 30	H, F, NE, T
814	Transcript of Sanford Merritt Beaver as Secretary of State 30(b)(6) and in personal capacity depo (Feb. 2, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 31	H, F, NE, T
815	Declaration of Chris Harvey (Aug. 25, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 35	H, F, NE
816	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION (Sept. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 36	H, F, NE
817	Cloudburst Security - Office of the Georgia Secretary of State FINAL Vendor Cyber Risk Assessment (Feb. 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 37	H, F
818	Cloudburst Security - Office of the Georgia Secretary of State Cyber Risk Assessment (Oct. 2017)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 38	H, F
819	Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia DRAFT (Aug. 25, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 39	H, F, A
820	Email chain between Josh Hood and Ted Koval RE: Fannin County IP (April 3, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 40	H, F

Exh	Document Description	Document Type	Objection
it No			S
821	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Dave Hamilton and	of Opposition to Defendants'	
	Kimberly Lemley Re:	Motions for Summary	
	[External]: Fwd:	Judgment Exhibit 41	
	Potential leakage of voter		
	data (Aug. 13, 2020)		
822	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Dave Hamilton and	of Opposition to Defendants'	
	Merritt Beaver Re: The	Motions for Summary	
	590 Rule Attestation	Judgment Exhibit 42	
	(Dec. 21, 2020)		
823	TRANSCRIPT OF	Plaintiffs' Exhibits in Support	H, F, NE
	HEARING ON	of Opposition to Defendants'	
	PRELIMINARY	Motions for Summary	
	INJUNCTION	Judgment Exhibit 44	
	PROCEEDINGS (July		
	26, 2019)		
824		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration of Eric. D.	Motions for Summary	
	Coomer (Nov. 13, 2019)	Judgment Exhibit 45	
825	STATE DEFENDANTS'	Plaintiffs' Exhibits in Support	H, F, NE
	RESPONSE TO	of Opposition to Defendants'	
	COURT'S QUESTIONS	Motions for Summary	
	ON NEW ELECTION	Judgment Exhibit 46	
	SYSTEM VENDOR		
	CONTRACT (July 30,		
	2019)		
826		Plaintiffs' Exhibits in Support	H, F, NE,
	Transcript of Gabriel	of Opposition to Defendants'	${ m T}$
	Sterling depo (Feb. 24,	Motions for Summary	
	2022)	Judgment Exhibit 48	
827	Secretary of State 2020	Plaintiffs' Exhibits in Support	H, F
	Security of the Voter	of Opposition to Defendants'	
	Registration System	Motions for Summary	
	Artifacts and Attestation	Judgment Exhibit 49	
	Pursuant to Rule 590-8-		
	301 (Dec. 18, 2020)		

828 Order - State Defendants' Motion to Dismiss Curling Plaintiffs' Third Amended Complaint and Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 51		Document Description	Document Type	Objection
Defendants' Motion to Dismiss Curling Plaintiffs' Third Amended Complaint and Of Opposition to Defendants' Motions for Summary Judgment Exhibit 51	it No		DI : 4:00 I E I : 1:1: C	
Supplemental Complaint	828	Defendants' Motion to Dismiss Curling Plaintiffs' Third Amended Complaint and Coalition Plaintiffs' First Supplemental Complaint	of Opposition to Defendants' Motions for Summary	H, NE, F
GJuly 20, 2020) 829 Bulletin State Election Board RE: GEMS Servers and Security (Sept. 12, 2016) Bulletin State Election Board RE: Suspected Russian Operative Activity (July 26, 2018) Bulletin State Election Board RE: Two Factor Authentication Security for ENET (July 30, 2018) Bulletin State Election Board RE: Physical Security Assessments Offered by Dept. of Homeland Security (Aug. 9, 2018) Bulletin State Election Board RE: Phishing Attempt (Aug 17, 2018) U.S. Dept. of Homeland Security Note re: U//F0UO Cybersecurity - Elections, Unattributed	829	Bulletin State Election Board RE: GEMS Servers and Security (Sept. 12, 2016) Bulletin State Election Board RE: Suspected Russian Operative Activity (July 26, 2018) Bulletin State Election Board RE: Two Factor Authentication Security for ENET (July 30, 2018) Bulletin State Election Board RE: Physical Security Assessments Offered by Dept. of Homeland Security (Aug. 9, 2018) Bulletin State Election Board RE: Phishing Attempt (Aug 17, 2018) U.S. Dept. of Homeland Security Note re: U//F0U0 Cybersecurity -	of Opposition to Defendants' Motions for Summary	M, H, F

Exh	Document Description	Document Type	Objection
it No			S
	Unattributed Cyber Actors Attempt to Gain Acces to City Government Network Prior to Primary Election Voting (Oct. 3, 2018)		
	U.S. Dept. of Homeland Security Note re: U//F0U0 Cybersecurity - Elections, Unattributed Network Acticity - Unattributed Actors Spoof Senior State Election Official's Email, Spear Phish City Clerk (Oct. 4, 2018)		
	Memo re: Election Security Information Needs: Foreign Threats to U.S. Elections (Sept. 5, 2018)		
	U.S. Dept. of Homeland Security Note re: (U) A Georgia Perspective on Threats to the 2018 U.S. Elections (Oct. 2, 2018)		
830	Email chain between Chris Harvey and Ryan Germany RE: FW: 2020 Rule 590-8-3 Attestation and Assessment v 3.2 (Dec. 30, 2020) atttachment Voter Registraton Certificate.pdf	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 53	H, F

Exh	Document Description	Document Type	Objection
it No		Bootiment Type	s
831		Plaintiffs' Exhibits in Support	H, F, NE
	Declaration of J. Alex	of Opposition to Defendants'	, ,
	Halderman (Aug. 19,	Motions for Summary	
	2020)	Judgment Exhibit 54	
832		Plaintiffs' Exhibits in Support	H, F, NE,
	Transcript of J. Alex	of Opposition to Defendants'	T
	Halderman depo (Nov.	Motions for Summary	
	17, 2021)	Judgment Exhibit 55	
833		Plaintiffs' Exhibits in Support	H, F, NE,
	Transcript of Andrew W.	of Opposition to Defendants'	T
	Appel depo (Jan. 27,	Motions for Summary	
	2022)	Judgment Exhibit 56	
834		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration of J. Alex	Motions for Summary	
	Halderman (Oct. 2, 2019)	Judgment Exhibit 57	
835	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Cathi Smothers and	of Opposition to Defendants'	
	Election Center RE:	Motions for Summary	
	Muscogee Help Please	Judgment Exhibit 58	
	RE: [EXTERNAL] RE:		
	Database Corrections		
	(April 2, 2020)		
836		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration of Elizabeth	Motions for Summary	
	Throop (Mar. 10, 2020)	Judgment Exhibit 59	
837		Plaintiffs' Exhibits in Support	H, F
	Email chain between	of Opposition to Defendants'	
	Chris Harvey and Blake	Motions for Summary	
000	Evans (Nov. 13, 2020)	Judgment Exhibit 60	ID II D
838		Plaintiffs' Exhibits in Support	ID; H; F
	Email chain between	of Opposition to Defendants'	
	Nick Salsman and Dave	Motions for Summary	
	Hamilto RE:	Judgment Exhibit 61	

Exh	Document Description	Document Type	Objection
it No			S
839	Election Office Notes: 10am 6/15/20 Meeting - Basic Overview most data provided by Michael Barnes. Nick and Terrence in attendance.	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 62	ID; H; F
840	Transcript of Derrick Gilstrap Fulton County Board of Registration and Elections 30(b)(6) depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 63	H, F, NE, T
841	Email chain between Michael Barnes and Scott Tucker RE: L&A Export to State (Jan. 15, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 64	H, F
842	Email chain between Kevin Rayburn and Veronica Johnson RE: ENR L&A Test Upload (June 2, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 65	H, F
843	Email chain between Chris Futrick and Paul Brandau RE: ElectioNet code / credentials posted publicly (Oct. 17, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 66	H, F
844	Transcript of James A. Barnes Jr. depo (July 20, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 67	H, F, NE, T
845	Email chain between Dave Hamilton and Michael Smith RE: DataLocker Follow Up (July 1, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 68	H, F
846	Transcript of David Hamilton depo (Jan. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 69	H, F, NE, T

Evh	Document Description	Document Type	Objection
it No		Document Type	s
847	Transcript of Richard Barron depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 70	H, F, NE, T
848	Transcript of Juan Gilbert Ph.D. depo (Oct. 29, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 71	H, F, NE, T
849	Screenshot of Youtube video: DouglasNow.com, Dominion Voting Machine Flaws – 2020 Election Coffee County, Georgia Video 1, YouTube (Dec. 9, 2020), https://www.youtube.com/watch?v=46CAKyyObls&t=16s	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 72	M, OW, A, F, NR, IS
850	Photo of computer serial number and note: SOS_Georgia and Votes!	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 73	OW, A, F, NR, H
851	Photo of note on computer	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 74	OW, A, F, NR, H
852	Declaration of J. Alex Halderman (Nov. 22, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 75	H, F, NE, M
853	Secretary of State Investigation report RE: Coffee County - Miscellaneous - SEB2020-250 (Sept. 28, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 76	H, F

Exh	Document Description	Document Type	Objection
it No			S
854	Transcript of interview of Brad Raffensperger re: U.S. House of Representatives Select Committee to Investigate the January 6th Attack on the U.S. Capitol (Nov. 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 77	H, F
855	Rev.com article "Georgia Secretary of State Brad Raffensperger Press Conference Transcript: Announces Hand Recount" (Nov. 11, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 78	H, F
856	Secure, Accessible & Fair Elections (SAFE) Commission Report - Submitted to the General Assembly (Jan. 10, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 79	H, F
857	Joint Discovery Statement Regarding Production of FBI Server Image (Aug. 28, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 80	NE, H, F
858			Unknown, ID
859	Secretary of State press release "Security- Focused Tech Company, Dominion Voting to Implement new Verified Paper Ballot System" (July 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 82	H, F
860	STATE DEFENDANTS' SUPPLEMENTAL NOTICE REGARDING NEW ELECTION SYSTEM VENDOR CONTRACT (Aug. 9, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 83	NE, H, F

Exh	Document Description	Document Type	Objection
it No	_		S
861	Master Solution	Plaintiffs' Exhibits in Support	H, F
	Purchase and Services	of Opposition to Defendants'	
	Agreement between	Motions for Summary	
	Dominion Voting	Judgment Exhibit 84	
	Systems and Secretary of		
	State of the State of		
	Georgia (July 29, 2019)		
862	Transcript of Chris	Plaintiffs' Exhibits in Support	H, F, T,
	Harvey as Secretary of	of Opposition to Defendants'	NE
	State 30(b)(6) (Jan. 28,	Motions for Summary	
	2022)	Judgment Exhibit 85	
863	Screenshot of Tweet from	Plaintiffs' Exhibits in Support	403, H, C,
	Gabriel Sterling with	of Opposition to Defendants'	F, NR
	responses from David	Motions for Summary	
	Cross and Marilyn	Judgment Exhibit 86	
	Marks (Oct. 1, 2022)		
864	TRANSCRIPT OF	Plaintiffs' Exhibits in Support	H, F, NE
	HEARING ON	of Opposition to Defendants'	
	PRELIMINARY	Motions for Summary	
	INJUNCTION (Sept. 10,	Judgment Exhibit 87	
	2020)		
865		Plaintiffs' Exhibits in Support	H, F, NE
	Declaration of J. Alex	of Opposition to Defendants'	
	Halderman (Aug. 2,	Motions for Summary	
	2021)	Judgment Exhibit 88	
866		Plaintiffs' Exhibits in Support	H, F, NE
	Declaration (Eighth) of	of Opposition to Defendants'	
	Philip B. Stark (Aug. 2,	Motions for Summary	
	2021)	Judgment Exhibit 89	
867		Plaintiffs' Exhibits in Support	H, F, NE
	Declaration (Second	of Opposition to Defendants'	
	Supplemental) of Philip	Motions for Summary	
	B. Stark (Oct. 22, 2019)	Judgment Exhibit 90	
868	Paper "Addendum to	Plaintiffs' Exhibits in Support	H, F
	Basic Security	of Opposition to Defendants'	
	Requirements for Voting	Motions for Summary	
	Systems" by Wenke Lee,	Judgment Exhibit 92	
	Ph.D. (Jan. 3, 2019)		

Exh	Document Description	Document Type	Objection
it No			S
869	REBUTTAL REPORT OF ANDREW W. APPEL (July 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 93	H, F, NE
870	"What Voters are Asked to Verify Affects Ballot Verification: A Quantitative Analysis of Voters' Memories of their Ballots" - By Richard A. DeMillo and Robert S. Kadel (Georgia Institute of Technology) and Marilyn R. Marks (Coalition for Good Governance) (Nov. 23, 2018) (Revised April 11, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 94	H, F
871	Georgia Voter Verification Study by The University of Georgia Political Science School of Public and International Affairs (Jan. 22. 2021) draft version	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 95	H, F, A, NR
872	Letter from professors to Secretary Crittenden, Secretary Raffensperger, and SAFE Commission Members (Jan. 7, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 96	F, H, A
873	Declaration of J. Alex Halderman (Dec. 16, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 97	H, F, NE
874	Email chain between Marilyn Marks and Richard Barron RE:	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 98	ID; H; F

Exh	Document Description	Document Type	Objection s
	More on Athens (June 12, 2020)		2
875	COALITION PLAINTIFFS' EXPERT DISCLOSURES – OPENING REPORTS (July 1, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 99	M; NE; H; F
876	Screenshot of Tweet thread from Ben Adida (Oct. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 100	H; F
877	Screenshot of Tweet thread from Jeanne Dufort and Ben Adida (Feb. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 101	H; F
878	Screenshot of Verified Voting map of Election Day Equipment - November 2022	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 102	H; F; A;
879	Declaration of Warren Stewart (Dec. 16, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 103	M; H; F; NE
880	Written Testimony of Verified Voting.org - Marian K. Schneider, President (June 5, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 104	H; F; A;
881	Transcript of Michael Barnes depo (Feb. 11, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 105	H; F; T; NE
882	Email chain between Chris Harvey and Ryan Germany RE: Election Certification (June 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 106	H; F

Exh	Document Description	Document Type	Objection
it No			s
883	Email chain between	Plaintiffs' Exhibits in Support	H; F
	Blake Evans and Andrew	of Opposition to Defendants'	
	Jackson RE: 3 images	Motions for Summary	
	(Mar. 1, 2019)	Judgment Exhibit 107	
884	Letter from Governor	Plaintiffs' Exhibits in Support	M; H; F
	Brian Kemp to the State	of Opposition to Defendants'	
	Election Board members	Motions for Summary	
	(Nov. 17, 2021)	Judgment Exhibit 108	
	Memo "Review of		
	Inconsistencies in the		
	Data Supporting the		
	Risk Limiting Audit		
	Report" (Nov. 17, 2021)		
885	Email chain between	Plaintiffs' Exhibits in Support	H; F
	Kay Stimson and Jen	of Opposition to Defendants'	
	Daulby RE: Voting issue	Motions for Summary	
	in Georgia (Nov. 8, 2020)	Judgment Exhibit 109	
886		Plaintiffs' Exhibits in Support	NR
	US Patent - Transparent	of Opposition to Defendants'	
	Interactive Printing	Motions for Summary	
	Interface (June 15, 2021)	Judgment Exhibit 110	
887	Email chain between	Plaintiffs' Exhibits in Support	H; F
	Chris Harvey and	of Opposition to Defendants'	
	Frances Watson RE:	Motions for Summary	
	FULTON COUNTY -	Judgment Exhibit 111	
	MACHINES DOWN		
	AND POLLING PLACES NOT OPEN (June 9,		
	2020)		
888	Email chain between	Plaintiffs' Exhibits in Support	H; F
	Julie Houk and Ryan	of Opposition to Defendants'	
	Germany RE: Election	Motions for Summary	
	Protection hotline	Judgment Exhibit 112	
	receiving reports of		
	voting machine/poll pad		
	issues in Floyd,		
	Chatham, Fulton and		

T71.	Danisa Danisa di an	D	01:4:
it No	Document Description	Document Type	Objection
10 10	Gwinnett Counties (Aug. 11, 2020)		S
889	Email chain between Ryan Germany and Frances Watson and Chris Harvey RE: Polling Machine Issues (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 113	H; F
890	Email chain between Chris Harvey and Richard Barron and Joseph Evans RE: Complaint - Down Machines (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 114	H; F
891	Email chain between Chris Harvey and Gabriel Sterling, Frances Watson, and Tom Feehan RE: Cross Keys High School- Dekalb (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 115	H; F
892	Email chain between Kevin Rayburn and Scott Tucker, Ryan Germany, Tom Feehan, and Cathi Smothers RE: continuing ENR issues (June 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 116	HF
893	Email chain between Chris Harvey and Joseph Evans RE: South Atlanta High School Polling Location machines not working (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 117	H; F

Exh	Document Description	Document Type	Objection
it No	_		s
894	Email chain between Gabriel Sterling and Tom Feehan, Chris Harvey RE: voter- 6 hour wait and not voted yet (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 118	H; F
895	Email chain between Chris Harvey and Erica Hamilton RE: MACHINES NOT WORKING, NO PAPER BALLOTS AVAIL (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 119	H; F
896	Email chain between Leigh Combs and Chris Harvey RE: Turning people away (June 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 120	H; F
897	TRANSCRIPT OF HEARING ON PRELIMINARY INJUNCTION (Sept. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 121	H; NE; F
898	STATE DEFENDANTS' OBJECTIONS AND RESPONSES TO CURLING PLAINTIFFS' FIRST SET OF INTERROGATORIES (July 15, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 122	H; F; NE
899	STATE DEFENDANTS' RESPONSES AND OBJECTIONS TO CURLING PLAINTIFFS' SECOND SET OF INTERROGATORIES (Aug. 23, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 123	H; F; NE

	Document Description	Document Type	Objection
it No			S
900	TRANSCRIPT OF	Plaintiffs' Exhibits in Support	H; F; NE
	TELEPHONE	of Opposition to Defendants'	
	CONFERENCE	Motions for Summary	
	PROCEEDINGS (Oct. 7,	Judgment Exhibit 125	
	2021)		
901		Plaintiffs' Exhibits in Support	H; F; NE
	Response to Revised	of Opposition to Defendants'	
	Interrogatories 15, 16,	Motions for Summary	
	19, 20, 21, 25, 26	Judgment Exhibit 126	
902	Email chain between	Plaintiffs' Exhibits in Support	H; F
	Frances Watson and	of Opposition to Defendants'	
	Pamela Jones RE: Fwd:	Motions for Summary	
	Coffee County (May 11,	Judgment Exhibit 127	
	2021)		
903		Plaintiffs' Exhibits in Support	H; F; NE;
		of Opposition to Defendants'	${ m T}$
	Transcript of Anh Le	Motions for Summary	
	depo (Nov. 4, 2021)	Judgment Exhibit 128	
904		Plaintiffs' Exhibits in Support	H; F; NE;
	Transcript of Mathew	of Opposition to Defendants'	T
	Mashburn depo (Nov. 4,	Motions for Summary	
	2021)	Judgment Exhibit 129	
905		Plaintiffs' Exhibits in Support	H; F; NE;
	Transcript of Rebecca	of Opposition to Defendants'	T
	Nash Sullivan, Esq. depo	Motions for Summary	
	(Nov. 5, 2021)	Judgment Exhibit 130	
906		Plaintiffs' Exhibits in Support	H; F; NE
	Declaration of J. Alex	of Opposition to Defendants'	
	Halderman (Feb. 12,	Motions for Summary	
	2021)	Judgment Exhibit 131	
907		Plaintiffs' Exhibits in Support	M; OW; H;
	Photos of Video of	of Opposition to Defendants'	F
	pollpads, scanning,	Motions for Summary	
0.5.5	receipt	Judgment Exhibit 133	0111 15 -
908		Plaintiffs' Exhibits in Support	OW; H; F;
	Photo of Acceptance	of Opposition to Defendants'	\mathbf{C}
	Sheet of General Election	Motions for Summary	
	Ballot (July 1, 2020)	Judgment Exhibit 134	

Exh	Document Description	Document Type	Objection
it No	_		s
909	Photo of pollpad receipt re: Sunday Liquor Sales total votes	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 135	OW; H; F; C
910	Dominion "2.02 Democracy Suite System Overview" (Nov. 26, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 136	H; F
911	Transcript of APC Raffensperger 21022, Speakers Brad Raffensperger, Mark Niesse, and Nicole Carr (Feb. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 137	H; F
912	Transcript of Sanford Merritt Beaver as Secretary of State 30(b)(6) depo (Mar. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 138	H; F; NE; T
913	Secretary of State press release "Secretary Raffensperger Calls on J. Alex Halderman to Agree to Release "Secret Report" and Pre-Election Testimony" (Jan. 27, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 139	H; F
914	Transcript of Janice W. Johnston M.D. (Aug. 23, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 140	H; F; NE; T
915	Transcript of Sara Tindall Ghazal (Nov. 5, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 141	H; F; NE; T

	Document Description	Document Type	Objection
it No			S
916	Transcript of Edward H. Lindsey Jr. (Aug. 31, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 142	H; F; NE; T
917	Statement of Interest RE: Vulnerability Disclosure Issues in Curling v. Raffensperger, No. 17-cv-2989 (N.D. Ga.) from Brandon Wales CISA to Brian Boynton Acting Assistant Attorney General (Jan. 20, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 143	H; F; NE
918	Notice from CISA "in response to matters raised at the Court's February 2, 2022 hearing regarding CISA's Coordinated Vulnerability Disclosure (CVD) process." (Feb. 10, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 144	H; F; NE
919	Status Report from CISA "on the final steps of CISA's Coordinated Vulnerability Disclosure process." (May 19, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 145	H; F; NE
920	CISA ICS Advisory (ICSA-22-154-01) - Vulnerabilities Affecting Dominion Voting Systems ImageCast X (June 3, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 146	H, F
921	Status Report from CISA "to update the Court and the parties on CISA's ongoing Coordinated Vulnerability Disclosure	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 147	H; F; NE

Exh	Document Description	Document Type	Objection
10 100	(CVD) process." (Mar. 14, 2022)		S
922	Status Report from CISA "to update the Court and the parties on CISA's ongoing Coordinated Vulnerability Disclosure (CVD) process." (Apr. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 148	H; F; NE
923	Transcript of Gabriel Sterling as Secretary of State 30(b)(6) depo (Oct. 12, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 149	H, F, NE, T
924	Transcript of Wendell Stone as Coffee County Board of Elections & Registration 30(b)(6) depo (Sept. 1, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 150	H, F, NE, T
925	Transcript of Eric B. Chaney 30(b)(6) depo (Aug. 15, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 151	H, F, NE, T
926	Paper "Basic Security Requirements for Voting Systems" by Wenke Lee, Ph.D. (Oct. 8, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 152	H, F
927	Declaration of J. Alex Halderman in Coomer v. Trump (Aug. 31, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 153	NE, H, F
928	Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia (Apr. 9, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 154	H, F

Exh	Document Description	Document Type	Objection
it No	_	•	s
929	Fortalice Red Team Penetration Test and Cyber Risk Assessment, State of Georgia, Office of the Secretary of State - November 2018	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 155	H, F
930	Fortalice Solutions Web Vulneability Remediation Checks, Secretary of State Georgia DRAFT (July 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 156	H, F
931	Fortalice Solutions Technical Assessment Prepared for Secretary of State Georgia DRAFT (May 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 157	H, F
932	Fortalice Solutions Firmware Comparison and Configuration Analysis, Secretary of State Georgia DRAFT (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 158	H, F
933	Email chain between Meghan Aubry and Adam Sparks RE: Curling, et al. v. Raffensperger, et. al subpoena - Fortalice initial production in response to subpoena (July 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 159	H, F
934	Email chain between Chris Harvey and Frances Watson RE: SOS complaint in Fulton (Nov. 6, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 160	H, F

Exh	Document Description	Document Type	Objection
it No			S
935	Powerpoint re: Fulton County SEB2020-027 Election Day Issues	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 161	H, F
936	Email chain between Chris Harvey and Frances Watson RE: photographs taken in poll in Hart County (Nov. 10, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 162	H, F
937	Email chain between Chris Harvey and Samantha Sheldon RE: Jefferson County Board of Elections (Feb. 26, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 163	Н, Г
938	Email chain between Michael Barnes and Clinch County Elections RE: Data Seals (July 9, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 164	H, F
939	SOS Request for Changes "RFC_Election Center Data Center" (Aug. 16, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 165	H, F, PK
940	Transcript of Dominic Olomo depo (Sept. 4, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 166	H, F, T, NE
941	Transcript of Dominic Olomo 30(b)(6) Fulton County Board of Registration and Elections depo (Jan. 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 167	H, F, T, NE
942	Email chain between Dwight Brower and Richard Barron, Derrick Gilstrap and Timothy	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 168	H, F

Exh	Document Description	Document Type	Objection
it No		Bocument Type	s
	Cummings RE: Concerns over handling of Early voting ballots (Nov. 20, 2020)		2
943	Notice on the Continuation of the National Emergency With Respect to Foreign Interference In or Undermining Public Confidence in United States Elections (Sept. 7, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 169	H, F
944	Email chain between Merritt Beaver and Klint Walker RE: DHS (Nov. 12, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 170	H, F
945	Email chain between Kevin Rayburn and Jordan Fuchs RE: I bet I can hack your electronic voting machines. (Apr. 5, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 171	H, F
946	Screenshot of text message thread from Eric Chaney (March 2018 - March 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 172	H, F, M, I, PK
947	Transcript of Misty Hampton depo (Nov. 11, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 173	Н, F, Т
948	Screenshot of text message thread to Eric and Cathy	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 174	H, F, I

Exh	Document Description	Document Type	Objection
949		Plaintiffs' Exhibits in Support	H, F, T,
040	Transcript of Dean M.	of Opposition to Defendants'	NE
	Felicetti depo (Sept. 2,	Motions for Summary	TVL
	2022)	Judgment Exhibit 175	
950	Screenshots re: "Coffee	Plaintiffs' Exhibits in Support	I, A, OW,
	County Board of	of Opposition to Defendants'	F
	Elections and	Motions for Summary	
	Registration Elections	Judgment Exhibit 176	
	Office Security Video	3	
	January 7, 2021"		
951		Plaintiffs' Exhibits in Support	I, A, OW,
	Screenshots re: "January	of Opposition to Defendants'	F
	8, 2021 From 5pm to	Motions for Summary	
	6pm missing video"	Judgment Exhibit 177	
952	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Paul Maggio and Sidney	of Opposition to Defendants'	
	Powell RE: 55A1722: Jim	Motions for Summary	
	Penrose - Coffee County	Judgment Exhibit 178	
	GA Forensics		
	Engagement Agreement		
	(Jan. 8, 2021)		T 1 TT T
953		Plaintiffs' Exhibits in Support	I, A, H, F
	SEALED - Coffee County	of Opposition to Defendants'	
	server activity	Motions for Summary	
054	spreadsheet	Judgment Exhibit 179	II D M
954	m : 1 CTZ :	Plaintiffs' Exhibits in Support	H, F, T,
	Transcript of Kevin	of Opposition to Defendants'	NE
	Skoglund depo (Dec. 16,	Motions for Summary	
955	2022) Screenshots of Coffee	Judgment Exhibit 181 Plaintiffs' Exhibits in Support	I, A, OW,
ยยย	County video footage of	of Opposition to Defendants'	F, A, OW,
	Jeffrey Lenberg (Jan. 27,	Motions for Summary	1.
	2021)	Judgment Exhibit 182	
956	Screenshots of Coffee	Plaintiffs' Exhibits in Support	I, A, OW,
	County video footage of	of Opposition to Defendants'	F
	Doug Logan and Jeffrey	Motions for Summary	-
	Lenberg (Jan. 18 and 19,	Judgment Exhibit 183	
	2021)		

Exh	Document Description	Document Type	Objection
it No			s
957		Plaintiffs' Exhibits in Support	H, F, T,
	Transcript of Jeffrey	of Opposition to Defendants'	NE
	Lenberg depo (Nov. 21,	Motions for Summary	
050	2022)	Judgment Exhibit 184	II D A I
958		Plaintiffs' Exhibits in Support	H, F, A, I
	HO CC O L TOO C	of Opposition to Defendants'	
	"Coffee County ICC &	Motions for Summary	
050	ICP Reports"	Judgment Exhibit 185	II TO A I
959	Email chain between	Plaintiffs' Exhibits in Support	H, F, A, I
	Misty Hampton and Tracie Vickers RE: Open	of Opposition to Defendants' Motions for Summary	
	Records Request (Feb. 4,	Judgment Exhibit 186	
	2021)	Guagment Pamoit 100	
960		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	, ,
	Declaration of J. Alex	Motions for Summary	
	Halderman (Jan. 7, 2023)	Judgment Exhibit 187	
961	Email chain between	Plaintiffs' Exhibits in Support	H, F, I
	Bruce Brown and	of Opposition to Defendants'	
	Defendants' Counsel RE:	Motions for Summary	
	JSON Format Cast Vote	Judgment Exhibit 188	
	Records on the Internet		
	(July 27, 2022)		
962	Screenshot of Tweet from	Plaintiffs' Exhibits in Support	H, F, I, M,
	Juha Keskinen RE:	of Opposition to Defendants'	NR, A, PK
	"Dominion Voting	Motions for Summary	
	Systems sues 'MyPillow Cuy' for \$1.2 billion"	Judgment Exhibit 189	
	Guy' for \$1.3 billion" (Feb. 26, 2021)		
963	Letter from Jil	Plaintiffs' Exhibits in Support	H, F, I, A
000	Ridlehoover to Board of	of Opposition to Defendants'	11, 1, 1, 11
	Elections Chair re her	Motions for Summary	
	resignation from Coffee	Judgment Exhibit 190	
	County (Feb. 25, 2021)		
964	Letter from Misty	Plaintiffs' Exhibits in Support	H, F, I
	Hampton to Board of	of Opposition to Defendants'	
	Elections Chair re her	Motions for Summary	
	resignation from Coffee	Judgment Exhibit 191	
	County (Feb. 25, 2021)		

Exh	Document Description	Document Type	Objection
it No			S
965	Screenshot of text	Plaintiffs' Exhibits in Support of Opposition to Defendants'	H, F, M, I
		Motions for Summary	
	message thread to Misty Hampton (Feb. 21, 2021)	Judgment Exhibit 192	
966	Trampton (Feb. 21, 2021)	Plaintiffs' Exhibits in Support	H, F, T,
300	Transprint of Iil	of Opposition to Defendants'	NE
	Transcript of Jil Ridlehoover depo (Aug.	Motions for Summary	NE
	1 \	Judgment Exhibit 193	
967	16, 2022) Fortalice Solutions	-	H, F
907	Incident Response,	Plaintiffs' Exhibits in Support of Opposition to Defendants'	11, r
	Evidence Collection	Motions for Summary	
	Process - Windows	Judgment Exhibit 194	
	Operating Systems (Feb.	Judgment Exmolt 194	
	26, 2021)		
968	Secretary of State press	Plaintiffs' Exhibits in Support	H, F
	release "Raffensperger to	of Opposition to Defendants'	11, 1
	Replace Coffee County	Motions for Summary	
	Election Equipment, End	Judgment Exhibit 195	
	Distraction for Local	o augment Emilion 100	
	Election Officials" (Sept.		
	23, 2022)		
969	, , ,	Plaintiffs' Exhibits in Support	H, F, I, A,
		of Opposition to Defendants'	PK
	Doc. 1377-4 - Hash	Motions for Summary	
	Verification	Judgment Exhibit 197	
970	Email chain between	Plaintiffs' Exhibits in Support	H, F, NR
	Bryan Tyson and all	of Opposition to Defendants'	
	counsel RE: Secretary	Motions for Summary	
	Raffensperger's Channel	Judgment Exhibit 200	
	11 Interview (Sept. 26,		
	2022)		
971		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration of James	Motions for Summary	
	Persinger (Nov. 10, 2022)	Judgment Exhibit 201	

	Document Description	Document Type	Objection
1t No. 972	Email chain between	Plaintiffs' Exhibits in Support	H, F, NR
	Bryan Tyson and Russ	of Opposition to Defendants'	, , , -
	Abney and Caroline	Motions for Summary	
	Middleton RE: Supplemental discovery	Judgment Exhibit 202	
	obligations—Coffee		
	County investigation		
	files (Jan. 16, 2023)		
973	Letter from Steven Ellis	Plaintiffs' Exhibits in Support	H, F
	Deputy General Counsel to GBI Director Vic	of Opposition to Defendants'	
	Reynolds Re: Request for	Motions for Summary Judgment Exhibit 203	
	Assistance in	oudgment Exmon 200	
	Investigation (Aug. 2,		
	2022)		
974	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Ryan Germany and Frances Watson and	of Opposition to Defendants' Motions for Summary	
	Chris Harvey RE: Polling	Judgment Exhibit 205	
	Machine Issues (June 9,	o dagmont Limion 200	
	2020)		
975	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Ryan Germany, Bryan Tygon, Caroy Millon, and	of Opposition to Defendants'	
	Tyson, Carey Miller, and Vincent Russo RE: FW:	Motions for Summary Judgment Exhibit 206	
	GASOS ORR #22-360	oudgment Emilett 200	
	from The Associated		
	Press (Aug. 1, 2022)		
976	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Sara Koth and Steven Ellis RE:FW: Open	of Opposition to Defendants' Motions for Summary	
	Records Request (July	Judgment Exhibit 207	
	12, 2022)		
977	Email chain between	Plaintiffs' Exhibits in Support	H, F, I
	Steven Ellis and Anthony	of Opposition to Defendants'	
	Rowell, Ryan Germany RE: Coffee County SEB	Motions for Summary	
	investigation (July 21,	Judgment Exhibit 208	
	2022)		

Exh	Document Description	Document Type	Objection
it No	_		s
978		Plaintiffs' Exhibits in Support	I, A, OW,
	Screenshots of Coffee	of Opposition to Defendants'	F, C
	County video footage	Motions for Summary	
	(Dec. 11, 2020)	Judgment Exhibit 209	
979		Plaintiffs' Exhibits in Support	I, A, OW,
	Screenshots of Coffee	of Opposition to Defendants'	F, C
	County video footage	Motions for Summary	
	(Dec. 11, 2020)	Judgment Exhibit 210	
980		Plaintiffs' Exhibits in Support	H, F, T,
	Transcript of Robert A.	of Opposition to Defendants'	NE
	Sinners depo (Sept. 28,	Motions for Summary	
	2022)	Judgment Exhibit 211	
981	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Harry MacDougald and	of Opposition to Defendants'	
	Robert Sinners RE: Data	Motions for Summary	
	File Needed for Vote	Judgment Exhibit 212	
	Swapping/Switching		
	(Nov. 10, 2020)		
982	LABELED Exhibit 215	Plaintiffs' Exhibits in Support	H, F
	[doc no. 1635-42]	of Opposition to Defendants'	
	Dominion Voting press	Motions for Summary	
	release "Customer	Judgment Exhibit 213	
	Notification: Maintaining		
	Secure Chain of Custody		
	for Your Dominion		
	Voting System" (May 6,		
	2021)		
983		Plaintiffs' Exhibits in Support	A, OW, F,
	Photo of note on	of Opposition to Defendants'	Q, C
	computer (same as	Motions for Summary	
	exhibit 74)	Judgment Exhibit 214	
984	Email chain between	Plaintiffs' Exhibits in Support	H, F, I
	Frances Watson and	of Opposition to Defendants'	
	Pamela Jones RE: Fwd:	Motions for Summary	
	Coffee County (May 11,	Judgment Exhibit 215	
	2021)		

	Document Description	Document Type	Objection
it No			S
985	Article from 11Alive	Plaintiffs' Exhibits in Support	H, F, I
	"Questions raised in	of Opposition to Defendants'	
	timeline of state response	Motions for Summary	
	to Coffee County breach"	Judgment Exhibit 216	
	(Sept. 26, 2022)		
986	Screenshot of video "The	Plaintiffs' Exhibits in Support	H, F, I,
	Carter Center, Restoring	of Opposition to Defendants'	OW, A
	Confidence in American	Motions for Summary	
	Elections Panel 3 -April	Judgment Exhibit 217	
	29, 2022, YouTube (May		
	9, 2022)" of Gabriel		
	Sterling with quote "So		
	we are still dealing with		
	that here and we still		
	have to prove negatives		
	in all these cases. It's		
	similar across the board.		
	But like, we had claims		
	even recently there was		
	people saying: 'We went		
	to Coffee County. We		
	imaged everything.'		
	There's no evidence of		
	any of that. It didn't		
	happen."		
987		Plaintiffs' Exhibits in Support	H, F, I
	Sharepoint Listing	of Opposition to Defendants'	
	Investigations for Coffee	Motions for Summary	
	County	Judgment Exhibit 218	
988		Plaintiffs' Exhibits in Support	H, F, NE
	Declaration (Seventh)	of Opposition to Defendants'	
	Philip B. Stark (Sept. 13,	Motions for Summary	
	2020)	Judgment Exhibit 219	
989		Plaintiffs' Exhibits in Support	H, F, T,
	Transcript of Philip	of Opposition to Defendants'	NE
	Stark depo (Dec. 16,	Motions for Summary	
	2022)	Judgment Exhibit 220	

Exh	Document Description	Document Type	Objection
it No			S
990		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration Philip B.	Motions for Summary	
	Stark (Jan. 11, 2020)	Judgment Exhibit 221	
991		Plaintiffs' Exhibits in Support	H, F, NE
	Declaration (Eighth) of	of Opposition to Defendants'	
	Philip B. Stark (Aug. 2,	Motions for Summary	
	2021)	Judgment Exhibit 222	
992	Declaration of Andrew	Plaintiffs' Exhibits in Support	H, F, NE
	W. Appel In Support of	of Opposition to Defendants'	
	Motion for Preliminary	Motions for Summary	
	Injunction (Dec. 13,	Judgment Exhibit 223	
0.5.5	2019)		
993		Plaintiffs' Exhibits in Support	H, F, NE
	Declaration (Fifth) of	of Opposition to Defendants'	
	Philip B. Stark (Aug. 23,	Motions for Summary	
	2020)	Judgment Exhibit 224	
994		Plaintiffs' Exhibits in Support	H, F, NE
	Declaration Philip B.	of Opposition to Defendants'	
	Stark (filed Sept. 11,	Motions for Summary	
	2018)	Judgment Exhibit 225	
995		Plaintiffs' Exhibits in Support	NE
		of Opposition to Defendants'	
	Declaration of Donna A.	Motions for Summary	
000	Curling (Aug. 7, 2018)	Judgment Exhibit 226	NIE
996	Declaration of Donna A.	Plaintiffs' Exhibits in Support	NE
	Curling In Support of	of Opposition to Defendants'	
	Brief Regarding	Motions for Summary	
007	Standing (Feb. 12, 2021)	Judgment Exhibit 227	m NE
997	The second of the CD	Plaintiffs' Exhibits in Support	T, NE
	Transcript of Donna	of Opposition to Defendants'	
	Curling depo (Jan. 19,	Motions for Summary	
000	2022)	Judgment Exhibit 228	H, F
998	Secretary of State press	Plaintiffs' Exhibits in Support	11, Г
	release "Secretary Refferences Calls On	of Opposition to Defendants' Motions for Summery	
	Raffensperger Calls On Department Of Justice	Motions for Summary Judgment Exhibit 229	
	To Investigate	ouuginent Exilibit 229	
L	10 mvesugate		

Exh	Document Description	Document Type	Objection
it No			S
	Allegations Of Fulton		
	County Shredding		
	Applications" (Oct. 11,		
	2021)		
999		Plaintiffs' Exhibits in Support	T, NE
		of Opposition to Defendants'	
	Transcript of Donna	Motions for Summary	
	Price depo (Mar. 8, 2022)	Judgment Exhibit 230	
1000		Plaintiffs' Exhibits in Support	NE
	Declaration of Donna	of Opposition to Defendants'	
	Price in support of	Motions for Summary	
	standing (Feb. 12, 2021)	Judgment Exhibit 231	
1001	Declaration of Jeffrey H.	Plaintiffs' Exhibits in Support	NE
	E. Schoenberg In	of Opposition to Defendants'	
	Support of Brief on	Motions for Summary	
	Standing (Feb. 12, 2021)	Judgment Exhibit 232	
1002		Plaintiffs' Exhibits in Support	T, NE
	Transcript of Jeffrey	of Opposition to Defendants'	
	Schoenberg depo (Oct.	Motions for Summary	
	19, 2021)	Judgment Exhibit 233	
1003		Plaintiffs' Exhibits in Support	NE
		of Opposition to Defendants'	
	Declaration of Donna	Motions for Summary	
	Price (Oct. 4, 2019)	Judgment Exhibit 234	
1004		Plaintiffs' Exhibits in Support	NE
		of Opposition to Defendants'	
	Declaration of Jeffrey	Motions for Summary	
	Schoenberg (Oct. 4, 2019)	Judgment Exhibit 235	
1005		Plaintiffs' Exhibits in Support	NE
	Declaration of Jeffrey	of Opposition to Defendants'	
	Schoenberg (Aug. 19,	Motions for Summary	
	2020)	Judgment Exhibit 236	
1006	Screenshot of video	Plaintiffs' Exhibits in Support	H, F, I,
	"Universite de Geneve	of Opposition to Defendants'	OW, A
	(UNIGE), How to	Motions for Summary	
	safeguard democracy? A	Judgment Exhibit 237	
	look back at the last		
	American presidential		

Exh	Document Description	Document Type	Objection
it No		2 octament 1 y pc	s
	election. Gabriel Sterling, YouTube (Oct. 4, 2021, uploaded Nov. 25, 2021)" with quote		
1007	Declaration of Jeffrey Schoenberg (Aug. 7, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 238	NE
1008	Declaration of Amber F. Reynolds (Aug. 20, 2018)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 239	H, F, NE
1009	Email chain between Alex Wan and Richard Barron and Marilyn Marks RE: Important report on Dominion system (Apr. 21, 2021	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 243	
1010	Email chain between Marilyn Marks, Fulton Election Board and numerous individuals from the City of Atlanta, Sandy Springs, Johns Creek, Roswell, Alpharetta RE: Fulton OfficialsUrgent Voting Protections Required Needed Actions (June 6, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 244	
1011	Email chain between Marilyn Marks and Richard Barron RE: FW: Correspondence to Fulton last month re scanner issue (July 8, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 245	

Exh Document Description I	Document Type	Objection
it No		S
1012 Email chain between F	Plaintiffs' Exhibits in Support	
Marilyn Marks and o	of Opposition to Defendants'	
Fulton County Election N	Motions for Summary	
Board RE: Urgent Issues J	Judgment Exhibit 246	
for BRE Consideration		
Voting System Problems		
(July 9, 2020)		
	Plaintiffs' Exhibits in Support	H, F
	of Opposition to Defendants'	
· · · · · · · · · · · · · · · · · · ·	Motions for Summary	
	Judgment Exhibit 247	
Barron RE: Logic and		
Accuracy Test for August		
election (July 8, 2020)		
	Plaintiffs' Exhibits in Support	H, F
	of Opposition to Defendants'	
	Motions for Summary	
	Judgment Exhibit 248	
Double QR Codes on		
Ballot (Oct. 22, 2020)	D1 : 4:66 + F 1:1:4 : C 4	II D M
	Plaintiffs' Exhibits in Support	H, F, T,
-	of Opposition to Defendants'	NE
1 (5 /	Motions for Summary	
·	Judgment Exhibit 249	T A OW
	Plaintiffs' Exhibits in Support	I, A, OW,
	of Opposition to Defendants' Motions for Summary	F, C
	Judgment Exhibit 250	
	Plaintiffs' Exhibits in Support	I, A, OW,
	of Opposition to Defendants'	F, C
	Motions for Summary	1,0
	Judgment Exhibit 251	
	Plaintiffs' Exhibits in Support	H, F, I,
	of Opposition to Defendants'	NR, 403
	Motions for Summary	-,
	Judgment Exhibit 252	

Exh	Document Description	Document Type	Objection
it No			S
1019		Plaintiffs' Exhibits in Support	H, F, T,
	Transcript of Benjamin	of Opposition to Defendants'	NE
	Cotton depo (Aug. 25,	Motions for Summary	
	2022)	Judgment Exhibit 253	
1020	Powerpoint re:	Plaintiffs' Exhibits in Support	H, F
	Cybersecurity	of Opposition to Defendants'	
	Considerations for	Motions for Summary	
	Voting Systems by	Judgment Exhibit 254	
	Wenke Lee		
1021		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration of Kevin	Motions for Summary	
	Skoglund (Dec. 5, 2022)	Judgment Exhibit 255	
1022		Plaintiffs' Exhibits in Support	H, F, NE
		of Opposition to Defendants'	
	Declaration of Benjamin	Motions for Summary	
	Cotton (June 8, 2022)	Judgment Exhibit 256	
1023		Plaintiffs' Exhibits in Support	H, F, T,
	Transcript of Doug	of Opposition to Defendants'	NE
	Logan depo (Nov. 18,	Motions for Summary	
	2022)	Judgment Exhibit 257	
1024	Shipping confirmation	Plaintiffs' Exhibits in Support	H, F, I
	"FW: Coffee County	of Opposition to Defendants'	
	Forensics FEDEX	Motions for Summary	
	Request" (Apr. 27, 2021)	Judgment Exhibit 258	
$1\overline{025}$	Secretary of State	Plaintiffs' Exhibits in Support	H, F
	Investigation report RE:	of Opposition to Defendants'	
	Coffee County -	Motions for Summary	
	Miscellaneous -	Judgment Exhibit 259	
	SEB2020-250 (Sept. 28,		
	2021)		
1026	Screenshot of video "The	Plaintiffs' Exhibits in Support	H, F, I,
	Carter Center, Restoring	of Opposition to Defendants'	OW, A
	Confidence in American	Motions for Summary	
	Elections Panel 3 -April	Judgment Exhibit 260	
	29, 2022, YouTube (May		
	9, 2022)" of Gabriel		
	Sterling with quote "So		

Exh	Document Description	Document Type	Objection
it No		Bocument Type	s
	we are still dealing with that here and we still have to prove negatives in all these cases. It's similar across the board. But like, we had claims even recently there was people saying: 'We went to Coffee County. We imaged everything.' There's no evidence of any of that. It didn't happen."		
1027	Secretary of State press release "Georgia's 2022 Statewide Risk Limiting Audit Confirms Results" (Nov. 18, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 261	H, F
1028	Transcript of Proceedings before the Honorable Judge John J. Tuchi - Motion Hearing in Kari Lake v. Katie Hobbs (July 21, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 262	NE, H, F
1029	Photos of tags with flashdrives redacted	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 263	M, F
1030	Transcript of J. Alex Halderman depo (Jan. 3, 2023)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 264	NE, T, H, F
1031	Transcript of Alex Andrew Cruce depo (Nov. 22, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 265	NE, T, H, F

Exh	Document Description	Document Type	Objection
it No			S
1032		Plaintiffs' Exhibits in Support	NE, T, H,
	Transcript of Blake	of Opposition to Defendants'	\mathbf{F}
	Edward Voyles depo	Motions for Summary	
	(Nov. 16, 2022)	Judgment Exhibit 266	
1033		Plaintiffs' Exhibits in Support	NE, ID
		of Opposition to Defendants'	
	Photos of tags with	Motions for Summary	
	flashdrives redacted	Judgment Exhibit 267	
1034	Screenshot of text	Plaintiffs' Exhibits in Support	H, F
	message thread from	of Opposition to Defendants'	
	Eric Chaney (March 2018	Motions for Summary	
	- March 2021)	Judgment Exhibit 268	
1035	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Paul Maggio and Sidney	of Opposition to Defendants'	
	Powell RE: 55A1722: Jim	Motions for Summary	
	Penrose - Coffee County	Judgment Exhibit 269	
	GA Forensics		
	Engagement Agreement		
	(Jan. 8, 2021)		
1036	Email chain between	Plaintiffs' Exhibits in Support	H, F
	Steven Ellis and Anthony	of Opposition to Defendants'	
	Rowell, Ryan Germany	Motions for Summary	
	RE: Coffee County SEB	Judgment Exhibit 271	
	investigation (July 21,		
	2022)		
1037		Plaintiffs' Exhibits in Support	NE, H, F,
	Transcript of telephone	of Opposition to Defendants'	R
	discovery conference	Motions for Summary	
	(Apr. 7, 2022)	Judgment Exhibit 272	
1038		Plaintiffs' Exhibits in Support	NE
		of Opposition to Defendants'	
	Declaration of Donna A.	Motions for Summary	
	Curling (May 28, 2019)	Judgment Exhibit 273	
1039		Plaintiffs' Exhibits in Support	NE
		of Opposition to Defendants'	
	Declaration of Donna	Motions for Summary	
	Price (May 28, 2019)	Judgment Exhibit 274	

Exh	Document Description	Document Type	Objection
it No	_		s
1040	Declaration of Jeffrey H. E. Schoenberg In Support of Motion for Preliminary Injunction (May 29, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 275	NE
1041	Publication in Election Law Journal "Ballot- Marking Devices (BMDs) Cannot Assure the Will of the Voters" (Feb. 14, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 287	H, F
1042	Fulton County Defendants' Response to Plaintiffs' Second Request for Admission (Aug. 30, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 290	NE
1043	Email chain between Robert McGuire and Josh Belinfante, Bruce Brown, Cary Ichter, David Cross, Marilyn Marks, and Jill Connors RE: Coalition's request for missing discovery files (Mar. 25, 2022)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 291	H, F
1044	Declaration of Donna A. Curling (Oct. 4, 2019)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 293	NE
1045	Declaration (Supplemental) of Marilyn Marks (Feb. 12, 2021)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 294	NE
1046	Declaration of Donna A. Curling In Support of Plfs' Motion for Preliminary Injunction (Aug. 19, 2020)	Plaintiffs' Exhibits in Support of Opposition to Defendants' Motions for Summary Judgment Exhibit 297	NE

Exh	Document Description	Document Type	Objection
it No			S
1047		Plaintiffs' Exhibits in Support	NE
		of Opposition to Defendants'	
	Declaration of Donna	Motions for Summary	
	Price (Aug. 19, 2020)	Judgment Exhibit 298	
1048		Plaintiffs' Exhibits in Support	NE, H, F
	Declaration	of Opposition to Defendants'	
	(Supplemental) of Kevin	Motions for Summary	
	Skoglund (July 27, 2022)	Judgment Exhibit 301	
1049	Harrison Floyd	Court Filing - State of	NP, NE,
	Consolidated Opposition	Georgia v. Harrison Floyd, et	H, F
	to Motions to Quash	<i>al.</i> , 23SC188947 (Fulton	
	Subpoenas	County Superior Court)	
1050	Matthew Bernhard,		NP, H, F,
	Allison McDonald, Henry	https://ieeexplore.ieee.org/doc	NE
	Meng, Jensen Hwa,	ument/9152705	
	Nakul Bajaj,		
	Kevin Chang, and J. Alex		
	Halderman. "Can Voters		
	Detect Malicious		
	$Manipulation\ of\ Ballot$		
	Marking Devices?," 2020		
	IEEE Symposium on		
	Security and Privacy		
	(SP), San Francisco, CA,		
	USA, 2020, pp. 679-694,		
	doi:		
	10.1109/SP40000.2020.0		
	0118. May 2020.		
	https://doi.org/10.1109/S		
	P40000.2020.		
1051	2021.04.12 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard relating to		H, F
	BMD verification rates		
	for ballots.		
1052	2021.04.12 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard relating to		H, F
	BMD verification rates		

Exh	Document Description	Document Type	Objection
it No			S
	for ballots and the lack of		
	study of paper ballots.		
1053	2021.04.12 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard relating to		H, F
	verification rates.		
1054	2021.04.12 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard relating to the		H, F, NR
	market for voting		
	equipment.		
1055	2021.04.12 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard relating to		H, F, NR
	Americans who don't like		
	paper ballots.		
1056	2021.03.18 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard relating to		H, F, NR
	"cosmic rays" affecting		
	voting machines.		
1057	2021.03.18 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard relating to		H, F, NR
	"cosmic rays" affecting		
	voting machines, and		
	providing source.		
1058	2020.10.26 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard relating to		H, F, NR
	"fearmongering		
	advocates" helping		
	supress voter turnout.		
1059		Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard responding to		H, F, NR
	Michigan Engineering		
	for avoiding voting if no		
	paper trail.		

Exh	Document Description	Document Type	Objection
it No			S
1060	2020.10.12 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard stating that		H, F
	his study did not find		
	that "almost 95% of votes		
	don't review their		
	printouts."		
1061	2020.10.12 Screenshot of	Tweet	NP,
	Tweet from Matt		Unknown,
	Bernhard clarifying that		H, F
	"40% of our participants		
	reviewed their ballots."		
1062	2020.11.21 Screenshort	Tweet	NP,
	of Tweet from Alex		Unknown,
	Halderman stating that		H, F
	the risk-limiting audit in		
	Georgia was positive.		
	Gabriel Sterling		
	replying.		
1063	2020.11.15 Screenshort	Tweet	NP,
	of Tweet from Alex		Unknown,
	Halderman stating that		H, F
	"I've seen no credible		
	evidence whatsover that		
	the 2020 presidential		
1004	outcome was hacked."	The state of the s	ND
1064	2020.11.13 Screenshot of	Tweet	NP,
	Tweet from Alex		Unknown,
	Halderman retweeting		H, F
	Frank Bajak regarding		
	U.S. election security		
1065	challenges. 2020.11.12 Screenshot of	Tweet	ND
1009	Tweet from Alex	1 weet	NP, Unknown
			Unknown, H, F
	Halderman reponding from a tweet of Donald		11, T
	Trump regarding		
	Dominion not having		
	deleted votes.		
	ueieteu votes.		

Exh	Document Description	Document Type	Objection
it No			s
1066	2020.11.24 Screenshot of	Tweet	NP,
	Tweet from Alex		Unknown,
	Halderman reponding to		H, F
	Julian Sanchez saying		,
	that "the strongest claim		
	real election security		
	experts can make is that		
	hacking outomces would		
	be 'complicated' and		
	there's no credible		
	evidence it happened."		
1067	2020.11.15 Screenshot of	Tweet	NP,
	Tweet from Alex		Unknown,
	Halderman reponding to		H, F
	Tweet from Joseph		
	Nierenberg.		
1068	2020.11.15 Screenshot of	Tweet	NP,
	Tweet from Alex		Unknown,
	Halderman reponding to		H, F
	Tweet from Joseph		
	Nierenberg. Halderman		
	stated that "If an		
	attacker can falsely		
	convince people the		
	results are wrong, that's		
	also a security failure."		
1069		Tweet	NP,
	Tweet from Alex		Unknown,
	Halderman reponding to		H, F
	Tweet from Joseph		
	Nierenberg regarding		
	election security.		
1070		Tweet	NP,
	Tweet from Alex		Unknown,
	Halderman regarding		H, F
	Georgia's previous voting		
	machines.		

Exh	Document Description	Document Type	Objection
it No			S
1071	2020.11.11 Screenshot of	Tweet	NP,
	Tweet from Alex		Unknown,
	Halderman regarding		H, F
	voters voting by different		
	methods.		
1072	2020.11.24 Screenshot of	Tweet	NP,
	Tweet from Alex		Unknown,
	Halderman replying to		H, F
	John Moser regarding		
	auditing ballots.		
1073	2020.11.24 Screenshot of	Tweet	NP,
	Tweet from Alex		Unknown,
	Halderman replying to		H, F
	John Moser regarding		
1051	forensic analysis.	m .	MD
1074	2023.10.15 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown,
	Marks regarding Sidney		NR
	Powell motion and Fani		
1075	Willis.	TI a - 4	ND
1075	2021.07.10 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown
	Marks stating that BMDs are not safe to		
	vote on.		
1076	2021.08.23 Screenshot of	Tweet	NP,
1070	Tweet from Marilyn	1 weet	Unknown,
	Marks responding to		H, F, I
	PeepleWatcher regarding		11, 1, 1
	explaining what a BMD		
	ballot looks like.		
1077		Tweet	NP,
1011	Tweet from Marilyn	1,4000	Unknown,
	Marks telling people to		NR
	ask their GA officials to		- 1±v
	read Andrew Appel's		
	newest report.		
1078	2022.01.20 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown

	Document Description	Document Type	Objection
it No			S
	Marks stating that		
	"there's no evidence that		
	widespread fraud or		
	hacking occurred."		
1079	2021.09.11 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown,
	Marks regarding		NR
	California voters.		
1080	2021.09.12 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown,
	Marks regarding not		NR, 403
	being affiliated with the		
	GOP.		
1081	2021.09.12 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown
	Marks regarding RLAs		
	implementation.		
1082	2021.09.12 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown,
	Marks regarding audit		NR
	for California recall.		
1083	2021.09.12 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown,
	Marks regarding "citizen		NR
	inspections" shouldn't be		
	called audits.		
1084	2021.11.23 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown,
	Marks regarding the		NR
	2020 election.		
1085	2021.09.04 Screenshot of	Tweet	NP,
	Tweet from Marilyn		Unknown,
	Marks regarding doing		NR
	verification work during		
	when GA law permitted		
	it.		
1086	2021.04.08 Screenshot of	Tweet	NP,
	Tweet from Kevin		Unknown,
	Skoglund regarding		H, F

Exh Document Descri	iption Document Type	Objection
it No		s
election not needed	to be	
easy/hard to hack.		
1087 2021.04.08 Screens	shot of Tweet	NP,
Tweet from Kevin		Unknown,
Skolgund regarding	g	H, F
reliability of election	on	
equipment.		
1088 2021.04.08 Screens	shot of Tweet	NP,
Tweet from Kevin		Unknown,
Skolgund regarding	g	H, F
malware affecting		
election results.		
1089 2021.02.10 Screens	shot of Tweet	NP,
Tweet from Kevin		Unknown,
Skoglund regarding		H, F
cendors being able		
both hardware and		
software engineering	ng	
change orders.		
1090 2021.02.10 Screens	shot of Tweet	NP,
Tweet from Kevin		Unknown,
Skoglund regarding		H, F
knowledge of de mi		
software changes a		
prior to memo from	L	
November 2019.	land of Manager	ND
1091 2021.02.10 Screens Tweet from Kevin	shot of Tweet	NP,
	+0	Unknown,
Skoglund replying		H, F
Eddie Perez regard minimus sofware	ing de	
changes before 201	o l	
1092 2020.11.16 Screens		NP,
Tweet from Kevin	TWEET	Unknown,
Skoglund regarding	or .	H, F
signing letter rebul		11, 1
Trump's claims as	_	
and unsubstantiate		

	Document Description	Document Type	Objection
it No			S
1093	2020.09.19 Screenshot of	Tweet	NP,
	Tweet from Kevin		Unknown,
	Skoglund to election		H, F
	officials asking to contact		
	their IT departments for		
	weekly data backups.		
1094	2020.08.08 Screenshot of	Tweet	NP,
	Tweet from Ash's Night		Unknown,
	Fury to Kevin Skoglund		H, F
	regarding voting systems		
	connected to the internet.		
1095	2020.08.08 Screenshot of	Tweet	NP,
	Tweet from Kevin		Unknown,
	Skoglund responding to		H, F
	Ash's Night Fury		
	regarding not observing		
	modems sold to all states		
	listed.		
1096	2020.11.29 Screenshot of	Tweet	NP,
	Tweet from Philip Stark		Unknown,
	replying to		H, F
	RedPillMagaMom		
	regarding his interviews		
	with MSM and Fox.		
1097		Tweet	NP,
	Tweet from Philip Stark		Unknown,
	replying to Ben Adida		H, F
	regarding reconciled		
	paper trail and standard		
	ballot accounting.		
1098	2020.11.08 Screenshot of	Tweet	NP,
	Tweet from Philip Stark		Unknown,
	regarding risk-limiting		H, F
	audit.		
1099	2020.11.08 Image from	Image contained in Tweet	NP,
	Philip Stark Tweet.		Unknown,
	Image of ballots cast in		H, F
	2020 contest per		

Exh	Document Description	Document Type	Objection s
	candidate. Risk limit audit shown for 5%.		
1100	Marilyn Marks Tweet thread, November 21, 2020	https://twitter.com/MarilynR Marks1/status/133041862965 8218497	NP, NR, I
1101	Marilyn Marks Tweet thread, November 22, 2020	https://twitter.com/MarilynR Marks1/status/133041862965 8218497	NP, NR, I
1102	Email from Marilyn Marks to Stephen Day, FW: Non-compliant "recount"/"RLA" November 13, 2020	CGG2021001276675 to CGG2021001276680	H, F
1103	Jeanne Dufort Tweet, November 22, 2020	https://twitter.com/dufort_jea nne/status/133073399407011 8400	NP, H, NR, I
1104	Marilyn Marks Tweet thread, November 14, 2020	https://twitter.com/MarilynR Marks1/status/132770594556 9447936	NP, I, H, F, NR
1105	Marilyn Marks Tweet thread, October 24, 2020	https://twitter.com/MarilynR Marks1/status/132008542806 2617602	NP, I, H, F, NR, NE
1106	Marilyn Marks Tweet thread, November 17, 2020	https://twitter.com/MarilynR Marks1/status/132874528064 5246976	NP, I, NR, 403
1107	Marilyn Marks Tweet thread, November 17, 2020	https://twitter.com/MarilynR Marks1/status/132875803939 5131392	NP, I, NR, 403
1108	Marilyn Marks Tweet thread, January 24, 2021	https://twitter.com/MarilynR Marks1/status/135339278472 4553734	NP, I
1109	Marilyn Marks Tweet thread, January 12, 2021	https://twitter.com/MarilynR Marks1/status/134901488427 7768199	NP, I, NR
1110	Marilyn Marks Tweet thread, January 1, 2021	https://twitter.com/MarilynR Marks1/status/134521797783 5266048	NP, I, NR, 403

Exh	Document Description	Document Type	Objection
it No			s
1111	2021.02.14 Email to marilyn@uscgg.org referencing attachment "Georgia Republican Party Election Conference Task Force Report-Final.pdf"	CGG20220000001	
1112	Georgia Republican Party Election Conference Task Force Report	CGG20220000002-10	
	2020.12.26 Email to marilyn@uscgg.org re: https://fb.watch/2DAvX- 2yAo/	CGG20220000011	
1114	2020.12.25 Email to marilyn@uscgg.org re: My counties. (List of counties under her caucaus: "They all have populations under 80,000"	CGG20220000012-13	
1115	Email to marilyn@uscgg.org dated 12.27.2020 re:Please proof this and let me know. I will attach the letter when I send to him.	CGG20220000014	
1116	Email to marilyn@uscgg.org dated 02.21.2021 re: BMDs do not meet the 2016 HB16 requirements	CGG20220000015	
1117	Email to Marilyn Marks dated 12.27.2020 re: Early opening of AB mail ballots; "You are not the Grinch!	CGG20220000016-17	

	Document Description	Document Type	Objection
it No	T 11 26 1 26 1	000000000000000000000000000000000000000	S
1118	Email to Marilyn Marks	CGG20220000018-20	
	dated 02.16.2021 re:		
	Even Gov. Kemp Would		
1110	Be Denied a Ballot	GGG000000001	
1119	Email to Marilyn Marks	CGG20220000021	
	dated 08.03.2011 re:		
	Excellent Experts'		
	reports served tonight -		
1100	All public information	CCC90990000099 99	
1120	Email to Marilyn Marks dated 08.14.2021 re: FW:	CGG20220000022-23	
	Replace the Dominion		
	System Before the 2022		
	Primary Incident Advantage Coordinates		
	InsiderAdvantageGeorgi		
1191	Email to Marilyn Marks	CGG20220000024	
1141	Email to Marilyn Marks dated 12.29.2020 re: Ed	CGG2022000024	
	Voyles		
1199	Email to Marilyn Marks	CGG20220000025	
1122	dated 12.27.2020 re:	CGG2022000029	
	Lamar County GOP		
	chair		
1123	Email to Marilyn Marks	CGG20220000026	
1120	dated 12.27.2020 re:		
	Lamar County GOP		
	chair		
1124		CGG20220000027-28	
	dated 08.15.2021 re:		
	Replace the Dominion		
	System Before the 2022		
	Primary		
	InsiderAdvantageGeorgi		
	a		
1125	Email to Marilyn Marks	CGG20220000029	
	dated 02.14.2021. Re: Tip		
	of iceberg disclosure of		
	tabulation and system		
	problems		

	Document Description	Document Type	Objection
it No	D 01. 35 0 35 3	add an add an add an add	S
1126	Email to Marilyn Marks	CGG20220000030	
	dated 10.21.2021 re:		
	Update (Response from		
	Cobb County attorney		
	requesting tomorrow to		
	answer questions)		
1127	Email to Marilyn Marks	CGG20220000031-32	
	dated 09.20.2022 FW:		
	SOS - Expert report		
	affirms accuracy of		
	Antrim County		
	presidential election		
	results		
1128	03.26.2021 Report	CGG20220000033-86	
	entitled Analysis of the		
	Antrim County,		
	Michigan November 2020		
	Election Incident by J.		
	Alex Halderman		
1129	Email to Marilyn Marks	CGG20220000087	
	dated 12.26.2020 re:		
	10:45 ET? Re: Zoom Call		
1130	Email to Marilyn Marks	CGG20220000088-90	
	dated 12.27.2020 re: My		
	counties		
1131	Email to Marilyn Marks	CGG20220000091	
	dated 2020.12.26 re:		
	zoom call		
1132	Email from Marilyn	CGG20220000092	
	Marks to Ed Voyles,		
	Misty Hampton, and		
	Cathy Latham dated		
	02.20.2021 re: Local		
	Option for HMPB-exists		
	today if lines are longer		
	than 30min		
1133	Georgia Regulation Ga.	CGG20220000093-96	
	Comp. R & Regs. R. 183-		

Exh	Document Description	Document Type	Objection
it No			S
	1-1211 Conducting		
	Elections		
1134	Email to Marilyn Marks	CGG20220000097-100	
	dated 06.12.2021 to		
	Cathy Latham re:		
	demanding \$75 million		
440	refund	99999999999	
1135	Email to Marilyn Marks	CGG20220000101	
	dated 12.26.2020 re:		
1100	10:45 ET? Re: Zoom Call	GGG9999999199	
1136	Email from Marilyn	CGG20220000102	
	Marks to Cthay Latham, Ed Voyles re:		
	Annotations on Hutton-		
	pulitzer testimony		
	attaching		
	GAsenateJudiciary12.3.2		
	020 Part 1_MRM		
	jhp2.dockx		
1137	GA Senate Judiciary	CGG20220000103-20	
	Sub-committee on		
	Election Law 12.30.2020		
1138	Email from Marilyn	CGG20220000121	
	Marks to		
	Welch47@protonmail.co		
	m; Cathy Latham re:		
	Cobb official recount docs		
	attachments: Official and		
	Complete - Election		
	Summary Report.pdf,		
	_		
1190	*	CCC2022000122	
1139	·	CGG20220000122 	
1140	*	CCC20220000122 127	
1140		CGG20220000123-137	
1139	Official and Complet - SOVC.pdf Election Summary Report	CGG20220000122 CGG20220000123-137	

Exh	Document Description	Document Type	Objection
it No		V 2	S
1141	Email from Marilyn	CGG20220000138	
	Marks to Cathy Latham		
	re: Dominion Contract		
	Info, Attachments:		
	20190729-FA-Dominion-		
	Contract.pdf, "Pages		
	from Dominion021577-		
	026667-6copy.pdf		
1142	Master Solution	CGG20220000139-250	
	Purchase and Services		
	Agreement between		
	Dominion Voting		
	Systems and Secretary of		
	State of the State of		
	Georgia (July 29, 2019)		
1143	Email from Mike	CGG20220000251-256	
	Frontera to Ryan		
	Germany dated		
	03.02.2020 re:Updated		
	Amendement;		
	Attachment GASOS		
	Amendment 1		
	03.02.2020.docx		
1144		CGG20220000257-261	
	Master Solution		
	Ppurchase and Services		
	Agreement between		
	Dominion Voting		
	Systems, Inc. and The		
	Secretary of State of the		
	State of Georgia	GGG00000000000000000000000000000000000	
1145	Email from Marilyn	CGG20220000262-63	
	Marks to Cathy Latham		
	re: FW: "Emergency"		
	Rule for mandatory early		
	scanning of ballots		

Exh	Document Description	Document Type	Objection
it No			S
1146	Email from Marilyn Marks to welch47@protonmail.com ; Cathy Latham; Pam Ausman re: FW: You Make the Laws. I'll Make ther Rules!"	CGG20220000264-265	
1147	Email from Marilyn Marks to Cathy Latham and Ed Volyles re: Authority of County boards to use hand marked paper ballots	CGG20220000266	
1148	Report/Presentation: When using BMDs "Wholly Or in Part is Not Practicable"	CGG20220000267-271	
1149	Correspondence from Brown to Cheryl Ringer dated 10.03.2020 re: Fulton County Board of Elections' Ongoing Violations of State law	CGG20220000272-276	
1150	Article - Georgia's US Senate Runoff Races at Risk - A Modest Proposal for a Defensible Vote Count	CGG20220000277-290	
1151	Email from Marilyn Marks dated 07.12.2021 to Cathy Latham re: FW: Essential new report in BMD court case against SOS	CGG20220000291	
1152	Expert Report of Andrew W. Appel dated 6.28.2021	CGG20220000292-323	
1153	Rule 5.4 Certificate of Service of Discovery (Expert Report of Appel	CGG20220000324-325	

	Document Description	Document Type	Objection
it No	and Halderman)dated		S
	07.01.2021		
1154	Email from Marilyn Marks dated 08.03.2021 re: FW: Excellent Experts' reports served tonight - All public information	CGG20220000326	
1155	REBUTTAL REPORT OF ANDREW W. APPEL (July 30, 2021)	CGG20220000327-337	
1156	Declaration of J. Alex Halderman dated 08.02.2021	CGG20220000338-361	
$1\overline{157}$	Eighth Declaration of Philip B. Stark dated 08.02.2021	CGG20220000362-405	
1158	Email from Marilyn Marks to Cathy Latham dated 08.03.2021 re: FW: Facing Critical Decisions on Upcoming Municipal Elections	CGG20220000406-407	
1159	Email from Marilyn Marks to Cathy Latham re: FW: Halderman report Update	CGG20220000408	
1160	Exhibit A to Halderman report	CGG20220000409-419	
1161	Transcript of Motions hearing Proceedings Before the Honorable Amy Totenberg dated 11.19.2021	CGG20220000420-539	
1162	Curling Plainiffs' Reply in Support of Plaintiffs' Motion to Sever dated 11.15.2021	CGG20220000540-680	

Exh	Document Description	Document Type	Objection
it No		V -	s
1163	Email from Marilyn	CGG20220000681-682	
	Marks to Caty Lathat,cc:		
	Ed Voyles re: Judhe		
	Totenberg opinion re:		
	BMD ballots and GA law		
1164	Opinion and Order dated	CGG20220000683-829	
	10.11.2020		
1165	Report - Georgia's US	CGG20220000830-843	
	Senate Runoff Races at		
	Risk - A Modest Proposal		
	for a Defensible Vote		
	Count		
1166	Email from Marilyn	CGG20220000844-847	
	Marks to Cathy Latham		
	dated 02.28.2021 re: FW:		
	Previous letter re:		
	demanding a475 million		
1105	refund		
1167	Email from Marilyn	CGG20220000848-851	
	Marks to Cathy Latham		
	re: FW: Previous letter		
	re: demanding \$75 million refund		
1169		CGG20220000852-853	
1100	Email from Marilyn Marksto Ed Voyles and	CGG20220000692-699	
	Cathy Latham re: FW:		
	Problems created by		
	omnibus bills - and		
	proposed solutions		
1169	Email from Marilyn	CGG20220000854-855	
	Marks to Cathy Latham		
	dated 07.30.2021 re"		
	FW": Prof.Alex		
	Halderman's sealed		
	report is subject of		
	discovery dispute heard		
	on Monday		

	Document Description	Document Type	Objection
it No			\mathbf{s}
1170	·	CGG20220000856-905	
	Statement Regarding		
	Access to Plaintifs'		
	Expert Report and		
	Unduly Burdensome Discovery dated		
	07.12.2021		
1171	Exhibit B to to Joint	CGG20220000906-912	
	Disco Statement		
1172	Transcript of Telephone	CGG20220000913-998	
	Conference Proceedings		
	Before the Honorable		
	Amy Totenberg dated		
	07.26.2021		
1173	Email from Rhonda J.	CGG20220000999	
	Martin to welch47 and		
	Cathy Lathat re: FW:		
	Proposed Changes to		
	Proposed Rules 183-1-12-		
1174	12 and 183-1-12-13 Martin Memo to State	CGG20220001000-1009	
1114	Election Board attaching	CGG20220001000-1009	
	revisions to Proposed		
	Rules 183-1-12-12 and		
	183-1-12-13 Tabulating		
	Results and Storage of		
	Returns respectively		
1175	Email from Marilyn	CGG20220001010-1014	
	Marks to Cathy Latham,		
	Ed Voyles re: FW:		
	Request to AJC for		
	clarification - FW:		
	Georgia braces for		
	contentious fight over Senated runoff results		
1176	Email from Marilyn	CGG2022000101015	
1110	Marks forwarding email	0002022000101010	
	from Moghimi, Madeline		
	to Cathy Latham, Ed		

Exh	Document Description	Document Type	Objection
it No		- 2	S
	Voyles, Misty Hampton		
	re: FW: Request to make		
	public comment HB531		
1177	Email from Marilyn	CGG2022000101016	
	Marks forwarding email		
	to welch47; Cathy		
	Latham dated 10.22.2021		
	re "October 28, 2021 re:		
	FW: State Election Board		
	Agenda.pdf		
1178	Agenda State Election	CGG2022000101017	
	Board via Webinar		
	(Office of Secretary of		
	State) dated 10.28.2021		
	9:00 a.m.		
1179	Email from Marilyn	CGG2022000101018	
	Marks dated 09.19.2021		
	forwarding to Cathy		
	Latham re: FW: State		
	Election Board Agenda -		
1100	September 21, 2021	0000000001010101010101	
1180	2	CGG2022000101019-1021	
	Board via Webinar		
	(Office of Secretary of		
	State) dated 09.21.2021		
1101	9:00 a.m. Email from Marilyn	CGG202200010101022	
1101	Marks to Cathy Latham	000202200010101022	
	dated 09.19.2021 re: FW:		
	State Election Board -		
	Notice of Rules Posted		
	for Public Comment		
1182		CGG202200010101023-1084	
1102	Notice of Proposed		
	Rulemaking Revisions to		
	Subject 183-1-12:		
	Preparation for and		

	Document Description	Document Type	Objection
it No			S
	Conduct of Primaries and		
	Elections		
1183	State Election Board	CGG20220001085-1095	
	Notice of Proposed		
	Rulemaking Revisions to		
	Subject 183-1-14:		
	Absentee Voting		
1184	Email from Marilyn	CGG20220001096	
	Marks to Cathy Latham		
	and Ed Voyles dated		
	12.27.2020 re: Lets's		
	discuss as alternative		
	when we talk		
1185	Email from Marilyn	CGG20220001097	
	Marks to Cathy Latham		
	with cc to		
	welch47@protonmail.com		
	re: Marietta tapes		
1186	v	CGG20220001098-1099	
	Marks to Cathy Latham		
	dated 02.21.2021 re:		
	BMDs do not meet the		
1105	2016 HB16 requirements	000000001100	
1187	V	CGG20220001100	
	Marks to Cathy Latham re: Dominion BMD		
	voting system FW:		
	Exerpts from Judge T's opinion and highlights of		
	her opinion		
1122	Opinion and Order dated	CGG20220001101-1247	
1100	10.11.2020	00020220001101-1247	
1189	Exhibit 5 Excerpts from	CGG20220001248-1251	
	10.11.20 Ruling - Judge		
	Amy Totenberg		

Exh	Document Description	Document Type	Objection
it No	T) '10 NE '1	GGG0000010¥0	S
1190	Email from Marilyn	CGG20220001252	
	Marks to Cathy Latham		
	dated 08.05.2021 re:		
	Dominion System		
	"reexamination"		
	attaching "Petition		
1101	Recent annotated.pdf'	CCC20200010¥0 1040	
1191	Correspondence from	CGG20220001253-1263	
	Marilyn Marks to The		
	Honorable Brad		
	Raffensperger requesting		
	reexamination of the		
	Dominion Votiing		
1100	System	GGGGGGGGGGGGGGGGGGGGGGGGGGGGGGGGGGGGGG	
1192	Email from Marilyn	CGG20220001264-1265	
	Marks to Ed Voyles,		
	Cathy Latham dated		
	12.27.2020 re: Early		
	opening of AB mail		
1100	ballots	22222222222	
1193	Email from Marilyn	CGG20220001266	
	Marks to Cathy Latham		
	re: Excellent Experts'		
	reports served tonight		
1104	All public information	GGGGGGGGGGGG	
1194	Email from Marilyn	CGG20220001267	
	Marks to Caty Latham		
	dated 12.26.2020 re:		
	Lamar County GOP		
1101	Chair		
1195	Email from Marilyn	CGG20220001268-1269	
	Marks dated 102.22.2021		
	to Cathy Latham, Pam		
	Ausman,		
	welch47@protonmail.com		
1100	re: Marietta tapes	GGG00000000000000000000000000000000000	
1196	Email to Cathy Latham	CGG20220001270-1272	
	dated 12.26.2020 re: My		
	counties		

Exh	Document Description	Document Type	Objection
it No	-	V -	s
1197	Email from Marilyn Marks to Cathy Latham dated 08.14.2021 re: Replace the Dominion System Before the 2022 Primary InsiderAdvantageGeorgi a	CGG20220001273-1274	
1198	Email from marilyn Marks to Ed Voyles and Cathy Latham re: Secret ballotFW: Election officials travel to Coffee County, Georgia to begin investigation KDNL	CGG20220001275-1276	
1199	Email from Marilyn Marks to Cathy Latham dated 02.14.2021 with cc to Ed Voyles re: Tip of iceberg disclosure of tabulation and system problems	CGG20220001277	
1200	Email from Marilyn Marks to welch47@protonmail.com and Cathy Latham dated 10.20.2021 re previous meeting of SEBFW: Comments on Proposed Rule making with attachments: "CGG Comments on Rulemaking 09.20.21.pdf"	CGG20220001278	
1201		CGG20220001279-1286	

Exh	Document Description	Document Type	Objection
it No	_		s
1202	Email form Marliyn Marks to Cathy Latham and Ed Voyles dated 02.14.2021 re: Redacted Experts Report filed with Court attachments: "2021-02-12 Halderman Redaction [dckt 1070_0]][1].pdf	CGG20220001287	
1203	Declaration of J. Alex Halderman dated 02.12.2021	CGG20220001288-1297	
1204	Email to Marilyn Marks dated 02.14.2021. Re: Tip of iceberg disclosure of tabulation and system problems; attaching: "Marks Declaration 20210212 CGG Doc. 1071 CGG Brief on Standing and Exhibits-2.pdf"	CGG20220001298	
1205	Supplemental Declaration of Marilyn Marks dated 02.12.2021	CGG20220001299-1330	
	Email from Marilyn Marks to Cathy Latham with cc to Ed Voyles dated 12.26.2020 re: Transcript of 11/23 Meeting re: Rough draft letter for Blackmon; attaching: "SEBspecialMtg23Nv202 0_otter.ai partial edits.docx"	CGG20220001331	
1207	SEBspecialMTg23Nov20 20 (unofficial rought transcript) 11/23	CGG20220001332-1356	

	Document Description	Document Type	Objection
it No			S
1208	Email from Marilyn	CGG20220001357	
	Marks to Cathy Latham		
	dated 10.21.2021 re:		
	Update; attaching		
	"Screen shot 2021-10-21		
	at 11.57.42 AM.png"		
1209	Highlighted excerpt	CGG20220001358	
	obtained from Curling		
	case teleconference		
	10.07.21 Topic SOS		
	witholding discovery		
	responses: highlights -		
	"suspected and possibly		
	actual compromises of		
	components of the		
	election system. We are		
	on a public call. So I'm		
	not going to get into		
	specifics about that"		
1210	Email from Marilyn	CGG20220001359	
	Marks to Cathy Latham		
	and Ed Voyles dated		
	12.26.2020 re: What if		
	Coffee County (and		
	maybe other counties)		
	led the way with two		
	security measures?		
1211	Email from Marilyn	CGG20220001360	
	Marks to Misty		
	Hampton, Ed Voyles, and		
	Cathy Latham dated		
	12.30.2020 re: You will		
	find this iinteresting		
	from our case; attaching:		
	"809-3 Harri		
	declaration.pdf		
1212	Declaration of Harri	CGG20220001361	
	Hursti dated 08.24.2020		

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, et al.

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

ATTACHMENT E-1

PLAINTIFFS' DEPOSITION DESIGNATIONS
DEFENDANTS' COUNTER-DESIGNATIONS
PLAINTIFFS' OBJECTIONS TO DEFENDANTS' COUNTERDESIGNATIONS

nation because
ınd that it is
und that the . 602)
stitutes or
does not contain to all wer, or that do
t is not relevant
constitutes or
tion because it
ncludes
iter designation esignation.
robative value it owing: unfair ing time, or
because it
udes privilege
tion the
ss to testify ere the original
t t i roit

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	No tendency to		
	make any fact more		
	or less probable and		
	the fact is not of		
	consequence in		
	determining the		
6:1 - 6:10	case, F.R.E. 401.		
	No tendency to		
	make any fact more		
	or less probable and		
	the fact is not of		
	consequence in		
7.7 7.14	determining the		
7:7 - 7:14	case, F.R.E. 401.		
	No tendency to		
	make any fact more or less probable and		
	the fact is not of		
	consequence in		
	determining the		
9:25 - 10:17	case, F.R.E. 401.		
0.20 10.11	No tendency to		
	make any fact more		
	or less probable and		
	the fact is not of		
	consequence in		
	determining the		
12:11 - 12:13	case, F.R.E. 401.		
	The cited portion	14:15 - 14:24	
	reflects an		
	incomplete answer,		
	F.R.E. 106. No		
	tendency to make		
	any fact more or less		
13:12 - 14:14	probable and the		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	fact is not of consequence in determining the case, F.R.E. 401.		
16:1 - 16:6	,		
	No tendency to make any fact more or less probable and the fact is not of consequence in determining the		
17:17 - 18:9	case, F.R.E. 401.		
18:19 - 19:13	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401. The cited portion reflects an	20:21 - 21:18 26:10	ARG; NR
21:19 - 26:9	incomplete answer, F.R.E. 106.		
28:8 - 28:15	1.14.14. 100.		
38:7 - 38:10			
	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the	38:11 - 38:20 39:11 - 39:13	NR
38:21 - 39:10	case, F.R.E. 401.		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
39:14 - 39:25			
	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401. Lack of		
	foundation/speculati		
41:6 - 42:22 45:3 - 45:22	on. F.R.E. 602. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
46:8 - 46:17	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	46:18 - 48:14	CM; 403
52:16 - 54:13	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401;		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	further object on the grounds that its reception would be unfairly prejudicial,		
	confusing, distracting, or a waste of time, F.R.E. 403. Lack of		
	foundation/speculati on. F.R.E. 602. No tendency to		
	make any fact more or less probable and the fact is not of consequence in		
	determining the case, F.R.E. 401; further object on the		
	grounds that its reception would be unfairly prejudicial,		
	confusing, distracting, or a waste of time, F.R.E. 403. Lack of		
	foundation/speculati on. F.R.E. 602. Designated		
58:2 - 60:2	testimony contains hearsay, F.R.E. 802		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
64:1 - 65:15	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculati on. F.R.E. 602. Designated testimony contains hearsay, F.R.E. 802		
69:11 - 69:18	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing,	69:7 - 69:10	I

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculati on. F.R.E. 602.		
70:9 - 70:16	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
71:4 - 72:7	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculati on. F.R.E. 602.		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
73:2 - 75:9	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculati on. F.R.E. 602.	72:23 - 73:1	
75:10 - 76:3	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial,	76:4 - 76:21	I

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculati on. F.R.E. 602.		
76:22 - 77:15			
78:7 - 78:15	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	77:17 - 78:2	NRT
82:4 - 83:7		84:20 - 85:7 88:17 - 88:22	SCOPE
95:4 - 95:9	Legal conclusion		
95:15 - 95:23			

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
96:5 - 96:24	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculati on. F.R.E. 602; improper/unsupport ed opinion testimony, F.R.E. 701.		
97:18 - 98:1	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial,	98:2 - 98:18	

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	confusing, distracting, or a waste of time, F.R.E. 403.		
99:5 - 99:24	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
104:8 - 104:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial,	103:13 - 104:7	CM

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	confusing,		
	distracting, or a waste of time,		
	F.R.E. 403; lack of		
	foundation, F.R.E.		
	602; designation is		
	lawyer argument		
	and not testimony of		
	the witness.		
	The cited portion		
	reflects an		
	incomplete answer,		
	F.R.E. 106. No		
	tendency to make		
	any fact more or less		
	probable and the fact is not of		
	consequence in		
	determining the		
	case, F.R.E. 401;		
	further object on the		
	grounds that its		
	reception would be		
	unfairly prejudicial,		
	confusing,		
	distracting, or a		
	waste of time,		
	F.R.E. 403; lack of		
	foundation, F.R.E.		
	602; designation is		
	lawyer argument and not testimony of		
104:23 - 105:13	the witness.		
101.20 100.10	The cited portion		
	reflects an		
105:23 - 106:2	incomplete answer,		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	F.R.E. 106. Lack of foundation, F.R.E. 602; designation is lawyer argument and not testimony of the witness.		
106:4 - 106:12	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designation is lawyer argument and not testimony of the witness.		
106:13 - 109:9	designation is lawyer argument and debate; lack of foundation, F.R.E. 602; designated		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	testimony contains hearsay, F.R.E. 802		
109:16 - 112:11	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designated testimony contains hearsay, F.R.E. 802; portions of the designation is lawyer argument/testimony of the witness.		
100.10 - 112.11	UIIC WIUIICBB.		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
112:16 - 113:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602.	153:16 - 154:7155:6 - 155:21	COM; LO; F
113:23 - 114:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial,		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602.		
117:17 - 117:20	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
118:9 - 118:12	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a	118:13 - 118:22	

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	waste of time, F.R.E. 403.		
118:25 - 119:16	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; compound question and argumentative.	119:17 - 120:1	
120:2 - 121:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	unfairly prejudicial, confusing,		
	distracting, or a		
	waste of time,		
	F.R.E. 403; lack of		
	foundation, F.R.E.		
	602; compound		
	questions and		
	The aited portion		
	The cited portion does not contain any		
	question. No		
	tendency to make		
	any fact more or less		
	probable and the		
	fact is not of		
	consequence in		
	determining the		
	case, F.R.E. 401;		
	further object on the grounds that its		
	reception would be		
	unfairly prejudicial,		
	confusing,		
	distracting, or a		
	waste of time,		
121:23 - 122:2	F.R.E. 403.		
	No tendency to	122:3 - 122:16	F; COM
	make any fact more		
	or less probable and		
	the fact is not of		
	consequence in determining the		
	case, F.R.E. 401;		
	further object on the		
122:17 - 122:21	grounds that its		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	reception would be unfairly prejudicial,		
	confusing,		
	distracting, or a		
	waste of time,		
	F.R.E. 403; lack of		
	foundation, F.R.E.		
	602; argumentative		
	attorney testimony.		
	The cited portion		
	contains only a		
	question and no witnesss testimony.		
	No tendency to		
	make any fact more		
	or less probable and		
	the fact is not of		
	consequence in		
	determining the		
	case, F.R.E. 401;		
	further object on the		
	grounds that its		
	reception would be unfairly prejudicial,		
	confusing,		
	distracting, or a		
	waste of time,		
	F.R.E. 403;		
	compound question		
124:8 - 124:12	and argumentative		
	The cited portion	123:7 - 124:7	COM; 403; S
	contains only an	124:19 - 126:3	
	answer and no		
	question. No		
194.14 194.19	tendency to make any fact more or less		
124:14 - 124:18	any fact more or less		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time,		
126:9 - 126:25	F.R.E. 403. Designated testimony contains hearsay, F.R.E. 802; designation contains compound question.	127:1 - 128:6 129:13 - 129:24	F; S
130:14 - 131:8	lack of foundation, F.R.E. 602; argumentative attorney testimony.	130:4 - 130:13	F; H; 403; CM
131:18 - 132:4	The cited portion omits the witness answer and contains a compound question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
132:6 - 132:7	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
132:8 - 132:18	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
132:21 - 132:22	The cited portion omits the question; testimony constitutes or contains improper opinion by a lay witness, F.R.E. 701-702.		
132:24 - 133:2	Exhibit that is the subject of the designation is not relevant and is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
133:19 - 134:15	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	waste of time, F.R.E. 403.		
135:7 - 135:10	The cited portion contains only an answer and no question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
135:12 - 135:12	The cited portion omits the question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
135:13 - 136:12	The cited portion omits the witness's entire answer. The cited portion contains questions that are argumentative, misrepresent witness testimony, and call for a legal conclusion. The testimony does not tend to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
136:14 - 136:15	The cited portion omits the question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
136:16 - 136:22	The cited portion contains only the attorney question. The designation does not tend to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		

т			
James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
136:25 - 137:5	The cited portion omits the question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	137:6 - 137:10	F; S
137:11 - 137:13	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	137:14 - 137:17	

James			
Barnes –	Defendants'	Defendants'	Plaintiffs'
July 20, 2022	Objections	Counter-	Counter
Deposition Designations	·	Designations	Objections
Designations	No tendency to		
	make any fact more		
	or less probable and		
	the fact is not of		
	consequence in		
	determining the		
	case, F.R.E. 401;		
	further object on the		
	grounds that its		
	reception would be		
	unfairly prejudicial,		
	confusing, distracting, or a		
	waste of time,		
	F.R.E. 403. Lack of		
	foundation/speculati		
	on, F.R.E. 602;		
	designation contains		
137:18 - 138:11	hearsay, 802.		
	Portions of	148:22 - 149:24	NR; 403; SCOPE
	designation lack	150:7 - 150:20	
	foundation and are	152:15 - 153:3	
140.14 140.01	speculative, F.R.E.		
146:14 - 148:21 151:20 - 152:7	602.		
101.20 - 102.7	Portions of the	153:16 - 154:7	SCOPE; LO; F
	designation are not	155:6 - 155:21	
	relevant and call for		
	speculation; F.R.E.		
	401, 602;		
	designation contains		
157:13 - 159:16	incomplete answer.		
	Designation does	153:16 - 154:7	LO; F
150 10 150 00	not contain	155:6 - 155:21	
159:18 - 159:22	question;		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
_	Calls for speculation, F.R.E. 602; incomplete designation, omits	152:15 - 153:3 153:16 - 154:7 155:6 - 155:21	SCOPE; F; LO
159:25 - 166:1 166:3 - 167:18	answer; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3153:16 - 154:7155:6 - 155:21	SCOPE; F; LO
167:20 - 168:9	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3 153:16 - 154:7 155:6 - 155:21	SCOPE; F; LO

James			
Barnes –		Defendants'	Plaintiffs'
	Defendants'	Counter-	Counter
July 20, 2022	Objections		
Deposition	·	Designations	Objections
Designations	NT / 1 /	15015 1500	CCODE E I O
	No tendency to	152:15 - 153:3	SCOPE; F; LO
	make any fact more	153:16 - 154:7	
	or less probable and	155:6 - 155:21	
	the fact is not of		
	consequence in		
	determining the		
	case, F.R.E. 401;		
	further object on the		
	grounds that its		
	reception would be		
	unfairly prejudicial,		
	confusing,		
	distracting, or a		
	waste of time,		
168:11 - 170:10	F.R.E. 403.		
170:16 - 172:15		173:1 - 173:6	CM
	No tendency to		
	make any fact more		
	or less probable and		
	the fact is not of		
	consequence in		
	determining the		
	case, F.R.E. 401;		
	further object on the		
	grounds that its		
	reception would be		
	unfairly prejudicial,		
	confusing,		
	distracting, or a		
	waste of time,		
173:23 - 175:3	F.R.E. 403.		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
175:16 - 176:10	Designation contains incomplete answer; F.R.E. 106; compound question and argumentative; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3 153:16 - 154:7 155:6 - 155:21	SCOPE; F; LO
176:12 - 177:3	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lacks foundation, F.R.E.		
178:5 - 178:8	Designation lacks any question; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lacks foundation, F.R.E. 602.		

James Barnes – July 20, 2022 Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Counter Objections
.=	Lack of foundation,		
178:15 - 178:20	F.R.E. 602.		
186:18 - 187:1			
191:23 - 192:16		198:17 - 199:4	S
	Lack of	198:17 - 199:4	S
100 04 104 10	foundations/specula		
193:25 - 195:13	tion, F.R.E. 602.	1001= 1001	
195:14 - 197:11		198:17 - 199:4	S
208:20 - 209:20			
234:4 - 234:8	Lack of foundations/specula tion, F.R.E. 602; incomplete designation, F.R.E. 106	215:7 - 215:14	
234:10 - 234:15	Lack of foundations/specula tion, F.R.E. 602; incomplete designation, F.R.E. 106	215:7 - 215:14	

Eric Chaney – August 15, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
8:13 - 8:15			
13:20 - 14:3			
	FRE 701 -object		
	to the extent		
	offered as a legal		
17:25 - 18:18	conclusion		

Eric Chaney – August 15, 2022	Defendants'	Defendants'	Plaintiffs'
Deposition	Objection(s)	Counter-	Counter
Designations	•	Designation(s)	Objections
	concerning Board		
	duties		
	Irrelevant FRE		
	401; Fifth		
	Amendment		
28:14 - 29:3	Privilege		
	Irrelevant FRE		
29:4 - 29:15	401		
	Irrelevant FRE		
30:7 - 30:16	401		
	Irrelevant FRE		
	401; Fifth		
	Amendment		
30:20 - 31:2	Privilege		
	Irrelevant FRE		
	401; Fifth		
	Amendment		
31:18 - 31:19	Privilege		
34:11 - 34:18			
	Fifth		
	Amendment;		
	Hearsay,		
	document speaks		
35:1 - 37:25	for itself;		
	Question of		
	counsel is not		
20.1 20.0	admissible		
38:1 - 38:2	testimony		
38:4 - 38:4	Fifth Amendment		
	Fifth		
	Amendment;		
	Hearsay, document speaks		
38:6 - 38:18	for itself;		
00.0 - 00.10	Fifth		
	Amendment;		
39:9 - 40:13	Hearsay,		
00.0 - 40.10	mearsay,		

Eric Chaney – August 15, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	document speaks		
44.11 44.10	for itself;		
44:11 - 44:16			
45:18 - 46:19	0 1: 0		
	Question of		
	counsel is not		
	admissible		
46:23 - 46:24	testimony		
	Fifth		
	Amendment;		
	Hearsay,		
	document speaks		
	for itself;		
	Incomplete use of		
	document FRE		
47:4 - 47:4	106		
47:6 - 47:14	Fifth Amendment		
	Fifth	49:02:00	
	Amendment;		
	Hearsay,		
	document speaks		
	for itself;		
	Incomplete		
	exchange FRE		
48:23 - 49:1	106		
52:9 - 52:18	Irrelevant 401	52:19-52:6	NR
53:7 - 53:10	Irrelevant 401	53:13-14	CM; NR
53:25 - 54:25	Irrelevant 401		
	Fifth		
	Amendment;		
55:1 - 56:1	Irrelevant 401		
	Fifth		
	Amendment;		
56:13 - 56:22	Irrelevant 401		

Eric Chaney -		Defendants'	Plaintiffs'
August 15, 2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	Objections
	Fifth		SCOPE; S
	Amendment;		
56:24 - 57:13	Irrelevant 401	57:14-58:6	
	Fifth		
	Amendment;		
58:7 - 58:15	Irrelevant 401		
	Fifth		
	Amendment;		
58:18 - 58:18	Irrelevant 401		
59:18 - 59:19	Irrelevant 401	59:20-59:24	NR; S
	Fifth		
	Amendment;		
	Irrelevant 401;		
	Hearsay,		
	document speaks		
	for itself;		
	incomplete		
	document FRE		
	106; lack of		
	foundation, FRE		
59:25 - 63:10	602		
64:9 - 64:18		64:19-65:09	ARG; NR
66:6 - 66:18		66:19-22	ARG; NR
66:23 - 68:23	Fifth Amendment		
70:22 - 71:12		71:13-16	ARG; NR
	Irrelevant FRE		
71:17 - 73:25	401		
	Irrelevant FRE		ARG; NR
74:4 - 74:11	401; Hearsay	74:12:00	
	Irrelevant FRE		ARG; NR
74:13 - 74:21	401; Hearsay	74:22-25	
	Irrelevant FRE		ARG; NR
75:1 - 76:10	401; Hearsay	76:11:00	
	Irrelevant FRE		ARG; NR
76:14 - 76:19	401; Hearsay	76:20:00	

Eric Chaney –	D - 6 1 4 - 2	Defendants'	Plaintiffs'
August 15, 2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations	Togtime		
	Testimony of counsel is not		
	admissible		
76:22 - 76:22	evidence		
	Irrelevant 401		
76:25 - 77:10			ADC. ND
77.99 70.9	Irrelevant FRE	70.4 7	ARG; NR
77:23 - 78:3	401; Hearsay	78:4-7	
70.0 70.0	Irrelevant FRE		
78:8 - 78:9	401; Hearsay		
01.0 01.10	Irrelevant FRE		
81:2 - 81:10	401;		
88:24 - 89:4	I 1 / DDD		ADC ND
	Irrelevant FRE		ARG; NR
01.0.00.0	401; Fifth	00.07.00	
91:3 - 92:6	Amendment	92:07:00	
	Irrelevant FRE		
	401; Fifth		
	Amendment;		
92:8 - 94:25	Hearsay		
	Irrelevant FRE		
95:1 - 95:16	401		
95:18 - 96:8	Fifth Amendment		
96:10 - 96:24	Fifth Amendment		
	Relevance, F.R.E.		
	401; and the cited		
	portion reflects an		
	incomplete		
96:25 - 97:25	statement.		
98:2 - 98:20	Fifth Amendment		
	Relevance, F.R.E.		
	401; and the cited		
	portion reflects an		
	incomplete		
98:23 - 99:4	statement.		
99:7 - 99:10	Fifth Amendment		
99:9 - 99:10	Fifth Amendment		

Eric Chaney -		Defendants'	Plaintiffs'
August 15, 2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections 0
Designations		Designation(s)	Objections
99:13 - 99:19	Fifth Amendment		
99:21 - 101:2	Fifth Amendment		
101:5 - 101:12	Fifth Amendment		
101:13 - 101:15			
102:5 - 103:14	Fifth Amendment		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
103:16 - 103:16	statement.		
103:18 - 106:5	Fifth Amendment		
106:7 - 106:7	Fifth Amendment		
106:17 - 108:1	Fifth Amendment		
109:9 - 109:15			
109:22 - 115:14	Fifth Amendment		
115:17 - 115:18			
116:9 - 117:18	Fifth Amendment		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
117:20 - 119:25	statement.		
	Relevance, F.R.E.		
	401; and the cited		
	portion reflects an		
	incomplete		
	statement;		
	further object on		
	the grounds that		
	its reception		
	would be unfairly		
	prejudicial,		
	confusing,		
120:1 - 120:11	distracting, or a		

Eric Chaney – August 15, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations		. ,	•
	waste of time, F.R.E. 403.		
	F.R.E. 400.		
	Fifth		
	Amendment; Its		
	reception would		
	be unfairly		
	prejudicial,		
	confusing,		
	distracting, or a		
	waste of time,		
120:13 - 121:20	F.R.E. 403.		
121:22 - 122:25	Fifth Amendment		
123:1 - 124:11	Fifth Amendment		
124:13 - 124:13	Fifth Amendment		
124:15 - 124:17	Fifth Amendment		
	The cited portion		
	reflects an		
	incomplete		
	answer, F.R.E.		
	106. No tendency		
	to make any fact		
	more or less		
	probable and the		
	fact is not of		
	consequence in		
	determining the		
	case, F.R.E. 401;		
	further object on		
	the grounds that		
	its reception		
	would be unfairly		
	prejudicial,		
	confusing,		
195.4 195.19	distracting, or a		
125:4 - 125:18	waste of time,		

Eric Chaney -			
August 15, 2022	Defendants'	Defendants'	Plaintiffs'
Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
Designations	F.R.E. 403. Lack		
	of		
	foundation/specul		
	ation. F.R.E. 602.		
125:20 - 126:11	Fifth Amendment		
126:13 - 127:3	Fifth Amendment		
127:7 - 128:7	Fifth Amendment		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
128:10 - 128:14	statement.		
128:16 - 129:3	Fifth Amendment		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
129:6 - 129:17	statement.		
129:20 - 129:25	Fifth Amendment		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
130:11 - 130:18	statement.		
130:20 - 131:23	Fifth Amendment		
	Fifth		
	Amendment; and		
	the cited portion		
132:1 - 132:10	reflects an		

Eric Chaney – August 15, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	incomplete		
	statement.		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
132:12 - 133:10	statement.		
133:12 - 133:12	Fifth Amendment		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
133:14 - 133:21	statement.		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
133:23 - 134:5	statement.		
134:7 - 134:7	Fifth Amendment		
	Relevance, F.R.E.		
	401; and the cited		
	portion reflects an		
	incomplete		
	statement;		
	further object on		
	the grounds that		
	its reception		
	would be unfairly		
	prejudicial,		
	confusing,		
	distracting, or a		
194.0 194.90	waste of time,		
134:9 - 134:20	F.R.E. 403.		

Eric Chaney -		Defendants'	Plaintiffs'
August 15, 2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
134:22 - 135:1	statement.		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
135:3 - 135:20	statement.		
135:22 - 137:8	Fifth Amendment		
137:10 - 137:11			
	Relevance, F.R.E.		
	401; further		
	object on the		
	grounds that its		
	reception would		
	be unfairly		
	prejudicial,		
	confusing,		
	distracting, or a		
	waste of time,		
144:14 - 144:20	F.R.E. 403.		
145:10 - 147:4	Fifth Amendment		
147:13 - 148:11	Fifth Amendment		
	Fifth		
	Amendment; and		
	the cited portion		
	reflects an		
	incomplete		
148:14 - 149:11	statement.		
	Hearsay, FRE		
	802; lack of		
	authentication,		
149:13 - 151:2	FRE 901;		

Eric Chaney – August 15, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	-	Designation(s)	Objections
	irrelevant, FRE		
	401; Fifth		
	Amendment		
	privilege		
	Hearsay, FRE		
	802; lack of		
	authentication,		
	FRE 901;		
	irrelevant, FRE		
	401; calls for		
	speculation, FRE		
	602; Fifth		
	Amendment		
151:5 - 152:25	privilege		
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
153:2 - 153:5	privilege		
	Hearsay, FRE		
	802; lack of		
	authentication,		
	FRE 901;		
	irrelevant, FRE		
	401; Fifth		
	Amendment		
153:7 - 154:1	privilege		
	Hearsay, FRE		
	802; lack of		
	authentication,		
	FRE 901;		
	irrelevant, FRE		
	401; Fifth		
154.9 154.95	Amendment		
154:3 - 154:25	privilege		
	Irrelevant, FRE		
155.7 155.14	401; Fifth		
155:7 - 155:14	Amendment		

Eric Chaney –	Dofordonts'	Defendants'	Plaintiffs'
August 15, 2022	Defendants'	Counter-	Counter
Deposition Designations	Objection(s)	Designation(s)	Objections
Designations	privilege;		
	assumes facts not		
	in evidence		
	Hearsay, FRE		
	802; lack of		
	authentication,		
	FRE 901;		
	irrelevant, FRE		
	401; Fifth		
	Amendment		
155:17 - 156:21	privilege		
	Hearsay, FRE		
	802; lack of		
	authentication,		
	FRE 901;		
	irrelevant, FRE		
	401; Fifth		
12000 12515	Amendment		
156:23 - 157:17	privilege		
	Hearsay, FRE		
	802; lack of		
	authentication, FRE 901;		
	irrelevant, FRE		
	401; Fifth		
	Amendment		
157:19 - 157:24	privilege		
10,110 10,121	Irrelevant, FRE		
	401; Fifth		
	Amendment		
158:1 - 158:19	privilege		
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
	privilege;		
	argumentative,		
158:22 - 158:24	FRE 403, 611		

Eric Chaney -		D 6 1 4 1	D1 •
August 15, 2022	Defendants'	Defendants'	Plaintiffs'
Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
159:11 - 159:15	privilege		
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
159:17 - 159:17	privilege		
	Irrelevant, FRE		
	401; improper		
	argument by		
162:20 - 163:11	counsel		
1011 1010	Irrelevant, FRE		
164:4 - 164:9	401		
1050 1050	Irrelevant, FRE		
165:3 - 165:8	401		
	Hearsay, FRE		
105.11 100.05	802; irrelevant,		
165:11 - 166:25	FRE 401		
167:1 - 167:11	Irrelevant, FRE		
107.1 - 107.11	Irrelevant, FRE		
167:13 - 167:18	401		
107.13 - 107.10	Irrelevant, FRE		
	401; lack of		
	authentication,		
	FRE 901; not		
	actually		
171:5 - 171:6	testimony		
	Fifth Amendment		
	privilege;		
	compound		
	question, FRE		
	403, 611; calls for		
	speculation, FRE		
	602; irrelevant,		
173:3 - 173:7	FRE 401		

Eric Chaney – August 15, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	Hearsay, FRE		-
	802; lack of		
	authentication,		
	FRE 901;		
	irrelevant, FRE		
	401; Fifth		
1-00 1-01-	Amendment		
173:9 - 173:17	privilege		
100.9 100.01	Fifth Amendment		
180:3 - 180:21	privilege Fifth Amendment		
180:23 - 181:8	privilege		
100.20 - 101.0	Lack of		
	authentication,		
	FRE 901;		
	irrelevant, FRE		
	401; not actually		
182:9 - 182:14	testimony		
	Irrelevant, FRE		
	401; Fifth		
100.15 100.5	Amendment		
182:15 - 183:5	privilege		
	Irrelevant, FRE 401; Fifth		
	Amendment		
	privilege;		
	improper		
	argument by		
183:8 - 183:11	counsel		
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
	privilege;		
	improper argument by		
183:13 - 183:23	counsel		

Eric Chaney – August 15, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
	privilege;		
	improper		
	argument by		
	counsel; calls for		
183:25 - 183:25	speculation		
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
184:7 - 184:10	privilege		
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
184:14 - 184:14	privilege		
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
184:16 - 184:19	privilege		
	Irrelevant, FRE		
	401; Fifth		
	Amendment		
184:21 - 185:5	privilege		

Ben Cotton – August 25, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
13:8 - 13:13			
	Irrelevant, FRE		
28:14 - 28:21	401		

Ben Cotton – August 25, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Irrelevant, FRE 401; calls for		
	speculation, FRE 602; confusing		
69:15 - 72:15	question, FRE 403, 611		
	Irrelevant, FRE		I; VA
	401; calls for speculation, FRE		
	602; incomplete		
	testimony, FRCP		
72:21 - 73:1	32(a)(6)	73:7-8	
79.7 74.10	Irrelevant, FRE 401		
73:7 - 74:19	Irrelevant, FRE		
74:20 - 75:11	401		
	Irrelevant, FRE		
81:17 - 82:4	401		
	Irrelevant, FRE		
82:8 - 83:22	401		
84:7 - 85:9	Irrelevant, FRE		
04.7 - 00.9	Irrelevant, FRE		
	401; lack of		
	authentication,		
85:10 - 85:20	FRE 901		
	Irrelevant, FRE		
86:17 - 87:10	401		
0.7.1.4.000.0	Irrelevant, FRE		
87:14 - 88:2	401		
00.7 00.11	Irrelevant, FRE		
88:7 - 89:11	Irrelevant, FRE		
89:17 - 90:13	401		

Ben Cotton – August 25, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Irrelevant, FRE		
	401; lack of authentication,		
93:8 - 94:10	FRE 901		
	Irrelevant, FRE		CM; NR
	401; lack of		
99:9 - 100:19	authentication, FRE 901	94:8-10	
20.0 100.10	Irrelevant, FRE	0 110 10	
105:19 - 105:21	401		
100.9 100.0	Irrelevant, FRE		
106:3 - 106:6	401 Irrelevant, FRE		ARG, CM
	401; incomplete		Alto, OM
	testimony, FRCP		
122:5 - 122:10	32(a)(6)	105:5-106:6	
100.15 100.7	Irrelevant, FRE		
122:15 - 123:7	401 Irrelevant, FRE		
123:11 - 123:12	401		
	Irrelevant, FRE		ARG, CM
	401; incomplete		
123:19 - 124:21	testimony, FRCP	124:22-8	
140.10 - 144.41	32(a)(6) Irrelevant, FRE	144,44*0	
125:9 - 126:9	401		
	Irrelevant, FRE		
126:21 - 127:5	401		
127:10 - 128:15	Irrelevant, FRE 401		
	Irrelevant, FRE		ARG, CM
	401; lack of		
1000 10011	foundation, FRE	10 7 7 100 0	
130:9 - 130:11	602	105:5-106:6	

Ben Cotton – August 25, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Irrelevant, FRE		
	401; lack of		
	authentication,		
131:15 - 134:8	FRE 901		
	Irrelevant, FRE		
134:19 - 138:17	401		
	Irrelevant, FRE		
139:15 - 140:2	401		
	Irrelevant, FRE		
140:13 - 140:22	401		
	Irrelevant, FRE		
141:12 - 141:18	401		
	Irrelevant, FRE		
142:2 - 142:4	401		
	Irrelevant, FRE		
143:18 - 144:2	401		
	Irrelevant, FRE		
144:8 - 144:11	401		
	Irrelevant, FRE		
144:12 - 145:5	401		
	Irrelevant, FRE		
145:12 - 146:1	401		
	Irrelevant, FRE		
	401; incomplete		
140 10 140 10	testimony, FRCP	140.00.140.0	
148:13 - 148:19	32(a)(6)	148:20-149:3	
140.4 140.0	Irrelevant, FRE		
149:4 - 149:6	401		
140.11 140.10	Irrelevant, FRE		
149:11 - 149:18	401		
	Irrelevant, FRE		
	401; lack of		
100.00 100.01	authentication,		
160:20 - 160:21	FRE 901		

Ben Cotton – August 25, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Irrelevant, FRE		
	401; lack of		
	authentication,		
161:6 - 161:21	FRE 901		
	Irrelevant, FRE		
	401; lack of		
	authentication,		
	FRE 901;		
	improper opinion		
	testimony, FRE		
162:9 - 162:15	702, FRCP 26		
	Irrelevant, FRE		
	401; compound		
	question, FRE		
171:12 - 171:15	403, 611		
	Irrelevant, FRE		
	401; compound		
151 00 150 5	question, FRE		
171:20 - 172:5	403, 611		ADC CM
	Irrelevant, FRE		ARG, CM
	401; lack of		
	authentication,		
	FRE 901;		
	incomplete		
179.17 179.5	testimony, FRCP	105:5-106:6	
172:17 - 173:5	32(a)(6) Irrelevant, FRE	100.0-100.0	
177:2 - 179:8	401		
111.4 - 113.0	Irrelevant, FRE		ARG, CM
	401; lack of		111to, ON
	authentication,		
	FRE 901;		
	incomplete		
	testimony, FRCP		
185:18 - 186:13	32(a)(6)	105:5-106:6	

Ben Cotton – August 25, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Irrelevant, FRE 401; compound		
	question, FRE		
	403, 611; calls for		
	speculation, FRE		
210:21 - 211:1	602		
	Irrelevant, FRE		
	401; compound		
	question, FRE		
	403, 611; calls for		
	speculation, FRE		
211:4 - 212:7	602		
	Irrelevant, FRE		
	401; compound		
	question, FRE		
212:8 - 212:12	403, 611		
	Irrelevant, FRE		
212:18 - 213:1	401		

Alex Cruce – November 22, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
8:18 - 8:20			
10:6 - 10:10			
	Irrelevant, FRE		
16:6 - 16:10	401		
	Irrelevant, FRE		
16:13 - 16:17	401		
	Irrelevant, FRE		
20:20 - 21:1	401		
	Irrelevant, FRE		
44:20 - 45:8	401; compound		

Alex Cruce – November 22, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	question, FRE 403, 611		
46:4 - 46:16	Irrelevant, FRE 401		
51:2 - 51:22	Irrelevant, FRE 401		
52:1 - 52:22	Irrelevant, FRE 401		
53:1 - 55:13	Irrelevant, FRE 401		
56:12 - 58:2	Irrelevant, FRE 401		
	Irrelevant, FRE 401; incomplete testimony,		I, CM, H
59:9 - 59:12	FRCP 32(a)(6)	59:14-60:11	
60:2 - 60:5	Irrelevant, FRE 401		
	Irrelevant, FRE 401; incomplete testimony,		H, F
60:12 - 60:20	FRCP 32(a)(6) Irrelevant, FRE	60:21-14	
64:20 - 65:19	401		
65:20 - 66:20	Irrelevant, FRE 401		
	FRE 602: Speculation; FRE 801:		
68:21 - 69:21	Hearsay FRE 802:		
70:9 - 71:21	Hearsay		
72:4 - 72:10			
73:4 - 73:8			
75:20 - 76:19			

Alex Cruce – November 22, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
79:14 - 80:20			
81:14 - 82:2			
82:14 - 82:20			
83:7 - 83:22			
	FRE 602:		
	Speculation;		
	FRE 801:		
84:1 - 85:22	Hearsay		
86:1 - 86:13			
	FRE 602:		
	Speculation;		
	FRE 802:		
	Hearsay; lack of		
88:1 - 98:10	foundation		
	FRE 602:		
	Speculation; FRE 802:		
106:19 - 109:16	Hearsay		
115:21 - 117:17			
117:18 - 119:19			
120:18 - 121:17			
134:14 - 134:22			
	FRE 602:		
	Speculation;		
	FRE 802:		
135:1 - 135:22	Hearsay		
	FRE 402:		
	Irrelevant; lack		
136:1 - 138:21	of foundation		
	FRE 802:		
139:7 - 141:22	Hearsay		
	FRE 802:		
142:22 - 144:2	Hearsay		
	FRE 602:		
144:15 - 147:20	Speculation		

Alex Cruce – November 22, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	FRE 802:		
150:2 - 150:20	Hearsay		
	FRE 802:		
152:5 - 154:19	Hearsay		
	FRE 602:		
154:20 - 157:10	Speculation		
175:4 - 176:4			
180:12 - 180:15			
	FRE 802:		
180:19 - 181:4	Hearsay		
181:8 - 181:14			
	FRE 602:		
182:16 - 183:17	Speculation		
192:22 - 194:6			

Dean Felicetti – September 2, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)
10:4 - 10:18		
14:15 - 14:18		
15:4 - 15:5		
15:13 - 16:8		
18:19 - 19:4		
22:22 - 23:7		
23:17 - 24:10		
24:22 - 25:11		
25:15 - 26:1		
26:13 - 26:18		
26:19 - 26:22		
27:10 - 27:16		
27:20 - 28:14		
28:17 - 29:7		
29:15 - 29:21		

Dean Felicetti – September 2, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)
30:3 - 30:16		
30:17 - 31:4		
32:10 - 33:11		
33:20 - 34:8		
34:9 - 34:10		
34:22 - 35:1		
35:7 - 35:18		
36:4 - 36:12		
36:19 - 37:13		
38:2 - 38:5		
	FRE 403 & 611(a):	
38:14 - 38:19	Vague	
38:20 - 39:4		
40:10 - 42:13		
	FRE 701: Improper	
43:6 - 46:5	lay opinion testimony	
	FRE 701: Improper	
	lay opinion	
	testimony; Lack of	
46:19 - 47:5	foundation	
48:1 - 48:8		
50:13 - 50:18		
51:1 - 51:6		
52:6 - 52:19		
53:15 - 55:10		
55:15 - 55:19		
56:11 - 57:9		
58:1 - 58:9		
58:18 - 59:1		
59:18 - 60:2		
60:12 - 60:21		
62:12 - 62:21		
63:14 - 63:19		
64:1 - 64:3		
	FRE 403 & 611(a):	
66:12 - 66:19	Vague	

Dean Felicetti – September 2, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)
Designations	FRE 403 & 611(a):	
67:18 - 69:1	Incomplete	
69:20 - 70:2	mompiote	
70:3 - 70:9		
71:3 - 72:21		
11.0 12.21	FRE 701: Improper	
73:13 - 73:22	lay opinion testimony	
75:3 - 75:6	lay opinion testimony	
10.0 10.0	FRE 701: Improper	
75:7 - 75:16	lay opinion testimony	
78:1 - 78:12	lay opinion testimony	
78:17 - 79:2		
79:12 - 81:8	FRE 402: Irrelevant	
86:5 - 86:16	TILE 402. Iffelevallt	
103:6 - 103:22		
	EDE 200, Hagney	
107:3 - 108:2	FRE 802: Hearsay	
111:1 - 111:9		
112:5 - 112:9		
112:19 - 113:6		
113:9 - 113:17	EDE 000 H	
114:3 - 116:17	FRE 802: Hearsay	
116:19 - 117:11	FRE 802: Hearsay	
117:19 - 118:1		
118:17 - 118:22		
119:4 - 119:15		
125:11 - 128:5		
130:14 - 131:5		
	FRE 401 - Not relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
139:15 - 140:14	n	
	FRE 401 - Not	
	relevant; FRE 602 -	
141:2 - 141:10	Lack of	

Dean Felicetti – September 2, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)
	foundation/speculatio	
	n	
	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
	n; FRE 701 - Legal	
141:12 - 142:9	conclusion	
	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
140.15	foundation/speculatio	
142:15 - 143:12	n EDE 401 N. 4	
	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
143:15 - 145:5	foundation/speculatio	
145.15 - 145.5	n FRE 401 - not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
145:12 - 147:5	n; FRE 801 - Hearsay	
110.12	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
154:17 - 155:9	n	
	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
157:2 - 157:19	n	
	FRE 401 - not	
	relevant; FRE 602 -	
	Lack of	
165:15 - 165:19	foundation/speculatio	

Designations n; The excerpted testimony is vague and ambiguous	Dean Felicetti – September 2, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)
testimony is vague and ambiguous FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 183:11 - 184:11 FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 189:3 - 189:11 FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 191:2 - 191:11 FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 401 - Not	Designations		Designation(s)
and ambiguous FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio prelevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant			
FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of			
relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of			
Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not 73:1 - 174:19 FRE 401 - Not 76:12 - 177:12 FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 183:11 - 184:11 FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 189:3 - 189:11 FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 191:2 - 191:11 n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of		FRE 401 - Not	
foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 183:11 - 184:11 FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 189:3 - 189:11 FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 191:2 - 191:11 n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of		relevant; FRE 602 -	
166:3 - 169:19		Lack of	
FRE 401 - Not relevant		foundation/speculatio	
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	166:3 - 169:19	n	
FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 183:11 - 184:11 FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 191:2 - 191:11 FRE 401 - Not relevant		FRE 401 - Not	
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	172:14 - 172:18	relevant	
FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 183:11 - 184:11 FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 191:2 - 191:11 FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of		FRE 401 - Not	
Triangle Triangle	173:1 - 174:19	relevant	
FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 183:11 - 184:11 FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 191:2 - 191:11 FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of		FRE 401 - Not	
$\begin{array}{c} \text{relevant; FRE 602 -} \\ \text{Lack of} \\ \text{foundation/speculatio} \\ \text{n} \\ \\ \text{I83:11 - 184:11} \\ \text{n} \\ \\ \text{FRE 401 - Not} \\ \text{relevant} \\ \\ \text{FRE 401 - Not} \\ \text{relevant; FRE 602 -} \\ \text{Lack of} \\ \text{foundation/speculatio} \\ \text{191:2 - 191:11} \\ \text{n} \\ \\ \text{FRE 401 - Not} \\ \\ \text{200:16 - 203:10} \\ \text{FRE 401 - Not} \\ \\ \text{FRE 401 - Not} \\ \\ \text{214:8 - 215:12} \\ \text{relevant} \\ \\ \text{FRE 401 - Not} \\ \\ \text{relevant} \\ \\ \text{FRE 401 - Not} \\ \\ \text{relevant} \\ \\ \text{FRE 401 - Not} \\ \\ \text{relevant} \\ \\ \text{FRE 401 - Not} \\ \\ \text{relevant} \\ \\ \text{FRE 401 - Not} \\ \\ \text{relevant} \\ \\ \text{FRE 401 - Not} \\ \\ \text{relevant} \\ \\ \text{FRE 401 - Not} \\ \\ \text{relevant; FRE 602 -} \\ \\ \text{Lack of} \\ \end{array}$	176:12 - 177:12	relevant	
Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of		FRE 401 - Not	
Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of		relevant; FRE 602 -	
183:11 - 184:11		Lack of	
183:11 - 184:11		foundation/speculatio	
189:3 - 189:11 relevant FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of Lack of	183:11 - 184:11	n	
FRE 401 - Not relevant; FRE 602 - Lack of foundation/speculatio 191:2 - 191:11 FRE 401 - Not 200:16 - 203:10 FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of		FRE 401 - Not	
relevant; FRE 602 - Lack of foundation/speculatio n FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of	189:3 - 189:11	relevant	
Lack of foundation/speculatio 191:2 - 191:11 FRE 401 - Not 200:16 - 203:10 FRE 401 - Not 214:8 - 215:12 FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of		FRE 401 - Not	
Lack of foundation/speculatio 191:2 - 191:11 FRE 401 - Not 200:16 - 203:10 FRE 401 - Not 214:8 - 215:12 FRE 401 - Not relevant FRE 401 - Not relevant; FRE 602 - Lack of		relevant; FRE 602 -	
191:2 - 191:11 FRE 401 - Not relevant FRE 401 - Not 214:8 - 215:12 relevant FRE 401 - Not relevant; FRE 401 - Not relevant; FRE 401 - Not relevant; FRE 401 - Not		•	
191:2 - 191:11 FRE 401 - Not relevant FRE 401 - Not 214:8 - 215:12 relevant FRE 401 - Not relevant; FRE 401 - Not relevant; FRE 401 - Not relevant; FRE 401 - Not		foundation/speculatio	
200:16 - 203:10	191:2 - 191:11	_	
200:16 - 203:10		FRE 401 - Not	
FRE 401 - Not relevant FRE 401 - Not relevant 15:22 - 216:18 FRE 401 - Not relevant FRE 401 - Not relevant; FRE 401 - Not relevant; FRE 602 - Lack of	200:16 - 203:10		
214:8 - 215:12 relevant FRE 401 - Not 215:22 - 216:18 FRE 401 - Not FRE 401 - Not relevant; FRE 602 - Lack of			
FRE 401 - Not relevant FRE 401 - Not relevant; FRE 401 - Not relevant; FRE 602 - Lack of	214:8 - 215:12		
215:22 - 216:18			
FRE 401 - Not relevant; FRE 602 - Lack of	215:22 - 216:18		
relevant; FRE 602 - Lack of			
Lack of			
		•	
10 MII MODOWING			
218:22 - 219:9 n	218.22 - 219.9	_	

Dean Felicetti – September 2, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)
	FRE 401 - Not	
219:19 - 225:3	relevant	
	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
226:11 - 227:2	n	
	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
228:4 - 230:15	n	
	FRE 401 - Not	
234:6 - 234:10	relevant	
	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
234:14 - 235:18	n	
	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
240:5 - 240:13	n	
	FRE 401 - Not	
241:15 - 243:8	relevant	
	FRE 401 - Not	
243:15 - 245:11	relevant	
	FRE 401 - Not	
255:7 - 257:17	relevant	
	FRE 401 - Not	
264:8 - 264:16	relevant	
	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
288:3 - 288:13	n	

Dean Felicetti – September 2, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)
	FRE 401 - Not relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
290:2 - 291:3	n; FRE 801 - Hearsay	
901.19 901.19	FRE 401 - Not	
291:13 - 291:18	relevant FRE 401 - Not	
	relevant; Contains no	
	witness testimony - is	
	Mr. Cross marking	
295:17 - 296:2	Exhibit 28 on the record.	
200.11 200.2	FRE 401 - Not	
	relevant; FRE 602 -	
	Lack of	
	foundation/speculatio	
	n; FRE 701 -	
	Contains	
	impermissible	
301:16 - 302:12	opinion testimony	

Derrick Gilstrap – January 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
7:1 - 7:4			
11:5 - 11:19			
12:1 - 12:7			
15:9 - 15:25			
16:1 - 16:25			

Derrick Gilstrap			
January 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	17:1 - 17:3-		
	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
	FRE 106;		
	17:4- 25: FRE		
	602 – lack of		
	foundation,		
	speculation;		
	Seeks a legal		
	conclusion		
	F.R.E. 701;		
	Seeks opinion on ultimate		
	issue F.R.E.		
17:1 - 17:22	704.		
17.1 - 17.22	FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	Seeks opinion		
	on ultimate		
	issue F.R.E.		
19:20 - 19:23	704		
	FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	Seeks opinion		
	on ultimate		
	issue F.R.E.		
24:20 - 25:2	704		
	Relevance,		
25:11 - 25:16	F.R.E. 401		

Derrick Gilstrap			
January 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	FRE 602 –		CM, I
	lack of		
	foundation,		
	speculation;		
	Seeks a legal		
	conclusion		
	F.R.E. 701;		
	Seeks opinion		
	on ultimate		
00.00 00.00	issue F.R.E.	15.4 05	
26:20 - 26:23	704.	17:4- 25	
07.01 07.05	Relevance,		
27:21 - 27:25	F.R.E. 401. FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	Seeks opinion		
	on ultimate		
	issue F.R.E.		
28:1 - 28:25	704.		
20.1 20.20	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
29:1 - 29:4	FRE 106.		
	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
35:21 - 35:25	FRE 106.		
	The citation		
	is an		
36:1 - 36:18	incomplete		

Derrick Gilstrap			
January 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	portion of the		
	question, FRE 106.		
	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
	FRE 106;		
	FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	Seeks opinion		
	on ultimate		
050 050	issue F.R.E.		
37:3 - 37:6	704.		
	The citation		
	is an		
	incomplete portion of the		
	question,		
	FRE 106;		
	FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	hearsay FRE		
61:12 - 61:25	801.		
	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
00.1.00.7	FRE 106;		
62:1 - 62:7	Seeks a legal		

Derrick Gilstrap		D 0 1	D 1 1 100 0
January 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	conclusion.		
	F.R.E. 701.		
	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
65:5 - 65:13	FRE 106.		
	The citation		
	is an		
	incomplete		
	portion of the		
	question.		
	FRE 106;		
	Lack of		
	foundation,		
68:12 - 68:15	speculation. F.R.E. 602.		
00.12 - 00.13	The citation		
	is an		
	incomplete		
	portion of the		
	question.		
68:20 - 68:25	FRE 106.		
	The citation		
	is an		
	incomplete		
	portion of the		
	question.		
69:1 - 69:2	FRE 106.		
	Seeks a legal		
	conclusion.		
72:3 - 72:11	F.R.E. 701.		
	Lack of		
90:14 - 90:25	foundation,		

Derrick Gilstrap			
January 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	speculation.		
	F.R.E. 602.		
	FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	Seeks a legal		
00.4.00.	conclusion		
92:4 - 92:7	F.R.E. 701.		
	FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	Seeks a legal conclusion		
100:10 - 100:20	F.R.E. 701.		
100.10 - 100.20	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
101:19 - 102:4	FRE 106.		
	FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	Seeks a legal		
	conclusion		
120:3 - 120:8	F.R.E. 701.		
	FRE 602 –		
	lack of		
	foundation,		
122:23 - 123:8	speculation.		
	FRE 602 –		
107 00 455 44	lack of		
135:22 - 136:15	foundation,		

Derrick Gilstrap			
January 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	speculation;		
	Seeks		
	impermissibl		
	e opinion		
	testimony		
	F.R.E. 701.		
100 - 100 10	Relevance,		
138:7 - 138:16	F.R.E. 401.		
	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
	FRE 106;		
190.10 190.05	Relevance,		
138:18 - 139:25	F.R.E. 401.		
	The citation		
	is an		
	incomplete portion of the		
	question,		
	FRE 106;		
	FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	hearsay FRE		
140:1 - 140:25	801.		
	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
	FRE 106;		
	FRE 602 –		
141:1 - 141:25	lack of		

Derrick Gilstrap - January 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	foundation, speculation; hearsay FRE 801.		
142:1 - 142:4	The citation is an incomplete portion of the question, FRE 106; FRE 602 – lack of foundation, speculation; Seeks a legal conclusion F.R.E. 701.		

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance,		
11:17 - 11:19	F.R.E. 401.		
16:8 - 16:10			
16:21 - 17:3			
	Seeks opinion		
	on ultimate		
	issue F.R.E.		
18:7 - 19:17	704.		
	Relevance,		
22:17 - 22:20	F.R.E. 401.		

Misty Hampton – November 11,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	The citation		
	is an		
	incomplete		
	portion of the		
	question,		
	FRE 106;		
	FRE 602 –		
	lack of		
	foundation,		
	speculation;		
	hearsay FRE		
23:3 - 24:8	801.		
	Seeks		
	impermissibl		
	e opinion		
	testimony		
	F.R.E.;		
	Seeks a legal		
20.14 20.01	conclusion		
28:14 - 28:21	F.R.E. 701.		
	The citation		
	is an		
	incomplete portion of the		
	question,		
	FRE 106;		
	Relevance,		
29:2 - 29:3	F.R.E. 401.		
20.2 20.0	Seeks opinion		
	on ultimate		
	issue F.R.E.		
29:5 - 29:18	704.		
	Hearsay FRE		
30:21 - 31:9	801.		
	Relevance,		
33:16 - 34:13	F.R.E. 401.		

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition,		CM, ARG, H
37:10 - 38:2	F.R.E. 106.	37:10 - 38:7	
38:5 - 38:13	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Relevance,	37:10 - 38:14	CM, ARG, H
20.16 20.10	F.R.E. 401. There is no context for this limited excerpt, FRE		
38:16 - 39:18 40:4 - 40:5	Relevance, F.R.E. 401. There is no context for this limited excerpt, FRE 106.		
40:13 - 40:18	Relevance, F.R.E. 401.	40:13 - 40:21	CM, ARG

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	The cited portion reflects an incomplete exchange in the deposition,		
40:20 - 40:21	F.R.E. 106. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	40:13 - 40:21	CM, ARG
49:22 - 51:2	Relevance, F.R.E. 401.		
51:3 - 51:3	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	51:3 - 51:5	CM, ARG
51:5 - 51:17	Relevance, F.R.E. 401. The cited portion reflects an incomplete	51:3 - 51:20	CM, ARG, I

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	exchange in		
	the		
	deposition,		
	F.R.E. 106.		CLE ADG T
	Relevance,		CM, ARG, I
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete exchange in		
	the		
	deposition,		
51:20 - 52:4	F.R.E. 106.	51:3 - 52:7	
01.20 02.1	Relevance,	01.0 02.1	CM, ARG
	F.R.E. 401.		,
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
54:20 - 54:22	F.R.E. 106.	54:20 - 55:6	07.5 A 70.00
	Relevance,		CM, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an incomplete		
	exchange in		
	the		
	deposition,		
55:5 - 55:6	F.R.E. 106.	54:20 - 55:6	
	Relevance,		CM, ARG
55:8 - 55:13	F.R.E. 401.	55:8 - 55:15	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
55:15 - 55:15	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	55:8 - 55:15	CM, ARG
56:1 - 56:9	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	56:1 - 56:11	CM, ARG
56:11 - 56:20	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the	56:1 - 56:22	CM, ARG

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	deposition, F.R.E. 106.		
	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the		CM, ARG
56:22 - 56:22	deposition, F.R.E. 106.	56:1 - 56:22	
57:2 - 57:5	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	57:2 - 57:8	CM, ARG
57:7 - 57:8	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	57:2 - 57:8	CM, ARG
	Relevance,	01.4 - 01.0	
57:10 - 57:18	F.R.E. 401. Relevance,		
58:7 - 59:2	F.R.E. 401.		

Misty Hampton – November 11, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations			
	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the		CM, ARG
50.16 60.17	deposition,	50.16 60.10	
59:16 - 60:17 60:21 - 60:21	F.R.E. 106. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	59:16 - 60:19 60:21 - 61:6	CM, ARG
61:1 - 61:5	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	60:21 - 61:6	CM, ARG
61:8 - 61:14	Relevance, F.R.E. 401. There is no context for this limited exchange		

Misty Hampton -			
November 11,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	excerpt, FRE		
	106.		
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
	excerpt, FRE		
62:2 - 62:4	106.		
	Relevance,		CM, I, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
62:5 - 63:20	F.R.E. 106.	62:5 - 64:5	
	Relevance,		CM, ARG, F
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
63:22 - 65:3	F.R.E. 106.	62:5-65:6	
	Relevance,		CM, ARG, F
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
65:5 - 65:16	incomplete	62:5-65:18	

Misty Hampton – November 11, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations			
	exchange in the deposition,		
	F.R.E. 106.		
	Relevance, F.R.E. 401. There is no context for		
	this limited exchange		
65:18 - 66:4	excerpt, FRE 106.		
	Relevance, F.R.E. 401. The cited portion reflects an incomplete		CM, ARG, NR
66:5 - 66:9	exchange in the deposition, F.R.E. 106.	66:5 - 67:16	
66:11 - 67:8	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	66:11 - 67:16	CM, ARG, NR
	Relevance, F.R.E. 401. The cited		CM, ARG, NR
67:14 - 67:20	portion	66:11 - 67:22	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	reflects an		
	incomplete exchange in		
	the		
	deposition,		
	F.R.E. 106.		
	Relevance,		CM, ARG, NR
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
67:22 - 68:3	F.R.E. 106.	66:11 - 68:6	
	Relevance,		CM, ARG, NRT
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete exchange in		
	the		
	deposition,		
68:8 - 68:11	F.R.E. 106.	68:8 - 69:4	
	Relevance,		CM, ARG, NRT
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
69:3 - 69:13	F.R.E. 106.	68:8 - 69:17	

Misty Hampton – November 11,		Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		5 ()	
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
	excerpt, FRE		
69:17 - 69:17	106.		
	Relevance,		
69:19 - 70:3	F.R.E. 401.		
	Relevance,		CM, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
70.4 71.1	deposition,	70.4 71.9	
70:4 - 71:1	F.R.E. 106.	70:4 - 71:3	CM ADC
	Relevance, F.R.E. 401.		CM, ARG
	The cited		
	portion reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
71:3 - 71:10	F.R.E. 106.	70:4 - 71:12	
	Relevance,	· · · · · · · · · · · · · · · · · · ·	CM, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
71:12 - 72:1	incomplete	70:4 - 72:4	

Misty Hampton – November 11, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations		(1)	,
_	exchange in the deposition,		
	F.R.E. 106.		
	Relevance,		CM, ARG
	F.R.E. 401.		,
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
79.9 79.10	deposition,	70.4 79.10	
72:3 - 72:10	F.R.E. 106.	70:4 - 72:10	CM ADC
	Relevance, F.R.E. 401.		CM, ARG
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
74:2 - 74:12	F.R.E. 106.	74:2 - 74:14	
	Relevance,		CM, ARG
	F.R.E. 401.		
	The cited		
	portion reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
74:14 - 74:21	F.R.E. 106.	74:2 - 74:21	
	Relevance,		
75:18 - 76:4	F.R.E. 401.		

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance,		
77:6 - 77:13	F.R.E. 401.		
	Relevance,		
78:3 - 78:7	F.R.E. 401.		CD F A D C
	Relevance,		CM, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
79:5 - 79:15	deposition, F.R.E. 106.	70.5 70.17	
19:0 - 19:10	Relevance,	79:5 - 79:17	CM, ARG
	F.R.E. 401.		OWI, AIVG
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
79:17 - 79:20	F.R.E. 106.	79:5 - 79:20	
	Relevance,		CM, F
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
85:21 - 86:2	F.R.E. 106.	85:21 - 86:19	
	Relevance,		CM, F
86:6 - 86:19	F.R.E. 401.	86:4-86:19	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	The cited portion reflects an incomplete exchange in the deposition,		
91:6 - 91:12	F.R.E. 106. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	91:2-91:15	CM, F, I
91:17 - 92:3	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	91:2-91:15	CM, F, I
92:5 - 93:2	Relevance, F.R.E. 401. The cited portion reflects an incomplete statement, F.R.E. 106.	92:2-93:2	CM, ARG

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance, F.R.E. 401. There is no context for this limited		
93:3 - 93:20	exchange excerpt, FRE 106. Relevance,		CM, ARG
	F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition,		
96:17 - 97:6	F.R.E. 106.	96:17 - 97:20	
	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition,		CM, ARG
97:19 - 97:19	F.R.E. 106. Relevance,	96:17 - 97:20	
99:19 - 101:10	F.R.E. 401.		
101:18 - 102:9	Relevance, F.R.E. 401. The cited portion reflects an incomplete	101:19-102:12	CM, F

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	exchange in the deposition,		
	F.R.E. 106. Relevance,		CM, ARG, I
	F.R.E. 401. The cited portion		
	reflects an incomplete		
	exchange in the deposition,		
102:13 - 102:15	F.R.E. 106.	101:13-102:22	
102:19 - 102:19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	102:2-102:22	CM, ARG
	Relevance, F.R.E. 401. Lack of foundation/sp eculation,	102.2-102.22	
102:21 - 104:7	F.R.E. 602. Relevance,		
104:12 - 104:14	F.R.E. 401.		
108:10 - 108:17	Relevance, F.R.E. 401. Lack of foundation/sp		

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	eculation, F.R.E. 602.		
	Relevance,		
112:12 - 113:12	F.R.E. 401.		
	Relevance,		NR, ARG, CM
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
11010 11010	deposition,	11010 11410	
113:13 - 113:19	F.R.E. 106.	113:13 - 114:10	ND ADO OM
	Relevance,		NR, ARG, CM
	F.R.E. 401.		
	The cited		
	portion reflects an		
	incomplete exchange in		
	the		
	deposition,		
113:21 - 113:21	F.R.E. 106.	113:13 - 114:10	
110.21 110.21	Hearsay,	110.10 111.10	CM, F, H
	F.R.E. 802.		
	Relevance,		
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
114:11 - 115:6	F.R.E. 106.	114:11 - 115:19	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Lack of foundation/sp		
	eculation,		
	F.R.E. 602.		
	Hearsay,		CM, F
	F.R.E. 802.		, <u>-</u>
	Relevance,		
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition, F.R.E. 106.		
	Lack of		
	foundation/sp		
	eculation,		
115:20 - 116:11	F.R.E. 602.	115:20 - 116:22	
	Hearsay,		CM, NR
	F.R.E. 802.		
	Relevance,		
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in the		
	deposition,		
	F.R.E. 106.		
	Lack of		
	foundation/sp		
	eculation,		
117:1 - 117:15	F.R.E. 602.	117:1 - 118:8	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Hearsay, F.R.E. 802. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/sp eculation,		CM, NR, ARG
118:9 - 118:17	F.R.E. 602. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/sp eculation, F.R.E. 602.	117:1 - 118:19 118:19 - 120:2	NR, ARG, CM, F
119:21 - 120:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete	119:21 - 120:2	NR, ARG

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	exchange in		
	the		
	deposition, F.R.E. 106.		
	Relevance,		NR, ARG
	F.R.E. 401.		1110, 1110
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the deposition,		
120:2 - 120:2	F.R.E. 106.	119:21 - 120:2	
	Relevance,		
121:2 - 121:4	F.R.E. 401.		
	Relevance,		NR, ARG, CM
	F.R.E. 401.		
	The cited		
	portion reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
121:22 - 122:7	F.R.E. 106.	121:22 - 123:22	
	Relevance,		
122:14 - 122:18	F.R.E. 401.		
	Relevance,		NR, ARG
	F.R.E. 401.		
	The cited		
	portion reflects an		
	incomplete		
	exchange in		
124:5 - 124:11	the	124:5 - 124:14	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	deposition, F.R.E. 106.		
	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in		NR, ARG
124:13 - 124:14	the deposition, F.R.E. 106.	124:5 - 124:14	
124:16 - 124:17	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	124:16-124:20	NR, ARG
124:19 - 124:20	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	124:16-124:20	NR, ARG
	Relevance, F.R.E. 401. The cited		NR, ARG
125:18 - 125:21	portion	125:18 - 126:1	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	reflects an		
	incomplete exchange in		
	the		
	deposition,		
	F.R.E. 106.		
	Relevance,		NR, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
1001 1001	deposition,	10710 1001	
126:1 - 126:1	F.R.E. 106.	125:18 - 126:1	
100.0 107.10	Relevance,		
126:9 - 127:16	F.R.E. 401.		NID ADC
	Relevance, F.R.E. 401.		NR, ARG
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
141:19 - 142:10	F.R.E. 106.	141:19 - 143:21	
	Relevance,		NR, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
140 10 140 10	exchange in	141 10 140 01	
142:13 - 142:16	the	141:19 - 143:21	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	deposition, F.R.E. 106.		
	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition,		NR, ARG
142:18 - 143:1	F.R.E. 106. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	141:19 - 143:21 141:19 - 143:21	NR, ARG
143:21 - 144:9	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	141:19 - 144:19	NR, ARG
144:12 - 144:16	Relevance, F.R.E. 401. The cited portion	141:19 - 144:19	NR, ARG

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
	F.R.E. 106.		ND ADC
	Relevance, F.R.E. 401.		NR, ARG
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
144:19 - 146:1	F.R.E. 106.	144:12 - 146:1	
	Relevance,		
154:17 - 155:1	F.R.E. 401.		
	Relevance,		
155:6 - 156:9	F.R.E. 401.		
	Relevance,		
160:16 - 161:9	F.R.E. 401.		
	Relevance,		NR, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
161:10 - 162:12	deposition, F.R.E. 106.	161:10 - 162:15	
101,10 - 102,12	Relevance,	101,10 - 104,10	NR, ARG
	F.R.E. 401.		1110, 11100
	The cited		
162:14 - 162:15	portion	161:10 - 162:15	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	reflects an incomplete		
	exchange in		
	the		
	deposition,		
	F.R.E. 106.		
	Relevance,		
162:17 - 162:19	F.R.E. 401.		
	Relevance,		NR, ARG
	F.R.E. 401.		
	The cited		
	portion reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
164:2 - 164:3	F.R.E. 106.	164:2 - 164:6	
	Relevance,		NR, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the deposition,		
164:6 - 164:6	F.R.E. 106.	164:2 - 164:6	
101.0 101.0	Relevance,	101,2 101,0	
164:8 - 164:16	F.R.E. 401.		
	Relevance,		NR, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
164:19 - 164:21	incomplete	164:19 - 165:1	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	exchange in		
	the		
	deposition,		
	F.R.E. 106.		17D 4 D G
	Relevance,		NR, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in the		
	deposition,		
165:1 - 165:1	F.R.E. 106.	164:19 - 165:1	
100.1 - 100.1	Relevance,	104.10 - 100.1	
165:16 - 165:18	F.R.E. 401.		
100.10 100.10	Relevance,		
165:19 - 166:11	F.R.E. 401.		
100.10 100.11	Relevance,		
188:6 - 189:12	F.R.E. 401.		
	Relevance,		NR, ARG
	F.R.E. 401.		,
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
189:13 - 190:21	F.R.E. 106.	189:13 - 190:22	
100 15	Relevance,		
193:15 - 194:1	F.R.E. 401.		
1040 1070	Relevance,		
194:2 - 195:6	F.R.E. 401.		
1000 1057	Relevance,		
196:3 - 197:5	F.R.E. 401.		

197:20 - 198:9	Relevance, F.R.E. 401. Relevance, F.R.E. 401.		
	· · ·		
198:15 - 200:2			
200:3 - 200:9	Relevance, F.R.E. 401.		175 A D G
201:22 - 204:7	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	201:22 - 204:20	NR, ARG
	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition,		NR, ARG
204:10 - 204:19	F.R.E. 106.	201:22 - 204:20	
206:3 - 206:20	Relevance, F.R.E. 401. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the	209:14 - 210:11	NR, ARG, CM

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	deposition, F.R.E. 106.		
	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in		NR, ARG, CM
210:4 - 210:4	the deposition, F.R.E. 106.	209:14 - 210:11	
210:5 - 210:5	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	209:14 - 210:11	NR, ARG, CM
210:7 - 210:11	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	209:14 - 210:11	NR, ARG, CM
	Relevance, F.R.E. 401. The cited		NR, ARG
210:13 - 210:14	portion	210:13-210:17	

Misty Hampton – November 11,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
	F.R.E. 106.		
	Relevance,		NR, ARG
	F.R.E. 401.		
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
910.10 910.17	deposition, F.R.E. 106.	210:13-210:17	
210:16 - 210:17	Relevance,	210:13-210:17	
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
	excerpt, FRE		
211:6 - 211:7	106.		
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
	excerpt, FRE		
211:16 - 212:9	106.		
	Relevance,		NR, ARG
	F.R.E. 401.		
010.10010.10	The cited		
212:12 - 212:13	portion	212:12 - 214:4	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
_	reflects an incomplete exchange in the deposition,		
212:16 - 214:4	F.R.E. 106. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	212:12 - 214:4	NR, ARG
214:15 - 215:1	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, FRE 106.		
215:6 - 216:6	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	215:6 - 216:12	NR, ARG, CM
216:19 - 217:10	Relevance, F.R.E. 401.	216:19 - 217:13	NR, ARG

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition, F.R.E. 106.		
	Relevance,		NR, ARG
	F.R.E. 401.		1116, 71160
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
217:13 - 217:13	F.R.E. 106.	216:19 - 217:13	
	Relevance,		
	F.R.E. 401. There is no		
	context for		
	this limited		
	exchange		
	excerpt, FRE		
217:18 - 218:11	106.		
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
000.15 000.00	excerpt, FRE		
222:15 - 222:22	106.		ND ADO
223:18 - 223:20	Relevance, F.R.E. 401.	223:18 - 224:1	NR, ARG
<u> 445:18 - 225:20</u>	г.к. г . 401.	<u> </u>	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
	F.R.E. 106.		ND ADO
	Relevance, F.R.E. 401.		NR, ARG
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
223:22 - 224:1	F.R.E. 106.	223:18 - 224:1	
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
004.9 004.7	excerpt, FRE		
224:3 - 224:7	106. Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
	excerpt, FRE		
227:2 - 229:16	106.		
	Relevance,		NR, ARG
230:8 - 231:5	F.R.E. 401.	230:8 - 231:9	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	The cited portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
	F.R.E. 106.		
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
991.0 991.19	excerpt, FRE		
231:9 - 231:12	Relevance,		NR, ARG
	F.R.E. 401.		MI, AIG
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
232:12 - 232:16	deposition, F.R.E. 106.	232:12 - 232:19	
202.12	Relevance,	202.12	NR, ARG
	F.R.E. 401.		,
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
202.12	deposition,	000 10 000 10	
232:18 - 232:19	F.R.E. 106.	232:12 - 232:19	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
	excerpt, FRE		
232:21 - 233:15	106.		
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
004.0.004.10	excerpt, FRE		
234:6 - 234:10	106.		
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for this limited		
	exchange excerpt, FRE		
237:19 - 237:22	106.		
201.19 - 201.22	Relevance,		NR, ARG
	F.R.E. 401.		IVII, AIIG
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
244:16 - 245:1	F.R.E. 106.	244:16 - 245:4	
	Relevance,		NR, ARG
245:4 - 245:4	F.R.E. 401.	244:16 - 245:4	

Misty Hampton – November 11, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	The cited		
	portion		
	reflects an		
	incomplete		
	exchange in		
	the		
	deposition,		
	F.R.E. 106.		
	Relevance,		
	F.R.E. 401.		
	There is no		
	context for		
	this limited		
	exchange		
	excerpt, FRE		
245:6 - 245:10	106.		
	Relevance,		
246:4 - 246:19	F.R.E. 401.		

Cathleen Latham – August 8, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance,		
10:17 - 10:19	F.R.E. 401.		
	Relevance,		
12:11 - 12:18	F.R.E. 401.		
	Relevance,		
19:18 - 19:20	F.R.E. 401.		
	Fifth		
20:6 - 20:13	amendment		
	Fifth		
21:20 - 21:23	amendment		

Cathleen Latham – August 8, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Fifth		
22:17 - 23:14	amendment		
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
23:15 - 26:5	amendment		
	Fifth		
26:19 - 27:6	amendment		
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
07.7 00.0	Fifth		
27:7 - 28:2	amendment		
	Lack of foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
29:3 - 34:12	amendment		
	Lack of		ARG; NR;
35:13 - 43:18	foundation/sp	43:25 - 44:7	

Cathleen Latham – August 8, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	eculation, F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
	amendment		
	Lack of		ARG; NR
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
44.10 40.10	Fifth	40.00 40.01	
44:12 - 48:19	amendment	48:20 - 48:21	ADC ND
	Lack of		ARG; NR
	foundation/sp		
	eculation, F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
48:22 - 48:22	amendment	48:25 - 48:25	
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
40.04 40.04	opinion,		
48:24 - 48:24	F.R.E. 701;		

Cathleen Latham – August 8, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Fifth		
	amendment		
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
49:1 - 49:1	amendment		
	Lack of		ARG
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
49:3 - 49:7	amendment	48:8 - 49:8	
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
49:9 - 49:9	amendment		
	Lack of		ARG; NR
	foundation/sp		
	eculation,		
49:11 - 49:12	F.R.E. 602;	49:13 - 49:13	

Cathleen Latham – August 8, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
	amendment		
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
49:14 - 49:14	amendment		
49:16 - 49:19			
	Fifth		
50:6 - 51:8	amendment		
51:11 - 51:25		52:1 - 52:5	ARG; NR
	Fifth		ARG; NR
52:10 - 52:13	amendment	53:5 - 53:8	
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
E9.1E EF.4	Fifth		
53:15 - 55:4	amendment		
	Lack of		
	foundation/sp eculation,		
55:8 - 57:18	F.R.E. 602;		
00.0 - 01.10	T.II.E. 002,		

Cathleen Latham – August 8, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth amendment		
	Lack of		ARG; NR
	foundation/sp		And, Nit
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
60:9 - 60:22	amendment	60:23 - 60:23	
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701; Fifth		
60:24 - 60:24	amendment		
00.21 00.21	Fifth		
61:1 - 61:15	amendment		
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
20 4 50 0	opinion,		
69:4 - 70:3	F.R.E. 701;		

Cathleen Latham – August 8, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Fifth		
	amendment		
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701;		
	Fifth		
70:16 - 73:16	amendment		
73:17 - 75:20			
75:17 - 75:20			
105:10 - 106:25			
113:15 - 117:10			
117:24 - 121:4			
	Relevance,		
121:20 - 122:11	F.R.E. 401		
	Relevance,		
122:12 - 123:13	F.R.E. 401		
124:4 - 124:14			
	Relevance,		
126:15 - 127:15	F.R.E. 401		
128:6 - 128:20		128:21 - 128:23	S
	Relevance,		
128:24 - 129:17	F.R.E. 401		
	Relevance,		
131:21 - 134:11	F.R.E. 401		
	Relevance,		
146:1 - 149:11	F.R.E. 401		
152:12 - 154:7			
	Relevance,		
163:15 - 164:5	F.R.E. 401		

Cathleen Latham – August 8, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance,		
164:12 - 165:2	F.R.E. 401		
169:5 - 171:20		171:21 - 171:25	ARG
172:1 - 172:18			
173:20 - 176:1			
176:4 - 176:10			
	Relevance,		
176:11 - 179:6	F.R.E. 401		
181:15 - 182:11		179:14 - 180:18	I; NR
	Lack of		
	foundation/sp		
	eculation,		
187:17 - 191:2	F.R.E. 602		
	Lack of		
	foundation/sp		
	eculation,		
203:2 - 203:20	F.R.E. 602		
	Relevance,		
203:25 - 206:9	F.R.E. 401		
211:19 - 212:9		208:6 - 211:12	NR; SCOPE
	Relevance,		ARG
212:19 - 212:22	F.R.E. 401	212:23 - 212:24	
	Relevance,		
212:25 - 212:25	F.R.E. 401		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
10:15 - 10:17			
	Relevance,		
16:3 - 17:7	F.R.E. 401		
	Relevance,		
22:4 - 23:6	F.R.E. 401		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance,		
23:11 - 24:14	F.R.E. 401		
	Relevance,		
29:17 - 31:4	F.R.E. 401		
22.12.22.1=	Relevance,		
32:13 - 32:17	F.R.E. 401	40.1 40.5 11.10	т
47:4 - 48:22		49:1 - 49:7, 51:13 - 52:8	Ι
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	relevance,		
53:11 - 57:9	F.R.E. 401		C I O
F0.10 F0.10	Relevance,	07.9 07.10	S; LO
58:10 - 58:19	F.R.E. 401	67:3 - 67:16	I. MD
71:8 - 72:7	Relevance, F.R.E. 401	69:21 - 71:7	I; NR
11.0 - 12.1	Relevance,	09.21 - 11.1	
74:4 - 75:4	F.R.E. 401		
71.1 70.1	Relevance,		
75:5 - 75:16	F.R.E. 401		
	Relevance,		
88:15 - 89:11	F.R.E. 401		
90:15 - 96:9			
	Relevance,		
99:10 - 102:2	F.R.E. 401		
102:11 - 104:5			
	Relevance,		
109:6 - 113:21	F.R.E. 401		
	Relevance,		
114:7 - 115:22	F.R.E. 401		
116:1 - 116:3			
116:7 - 116:9			
	Relevance,		
116:16 - 120:6	F.R.E. 401		

Jeffrey Lenberg		Defendants'	Plaintiffs'
- November 21,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	
	Relevance,		
120:7 - 121:2	F.R.E. 401		
	Relevance,		
121:3 - 121:21	F.R.E. 401		
122:6 - 122:9			
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	relevance,		
123:1 - 129:22	F.R.E. 401		
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	relevance,		
130:1 - 130:18	F.R.E. 401		
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	relevance,		
132:12 - 134:4	F.R.E. 401		
134:21 - 136:2			
136:6 - 136:7			
	Relevance,		
139:19 - 147:15	F.R.E. 401		
	Relevance,		
152:5 - 153:2	F.R.E. 401		
	Relevance,		
156:17 - 157:13	F.R.E. 401		
159:4 - 159:8			
160:18 - 162:18			
	Relevance,		
164:8 - 165:14	F.R.E. 401		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance,		
173:21 - 174:8	F.R.E. 401		
	Relevance,		
174:15 - 175:9	F.R.E. 401		
175:18 - 176:22			
177:1 - 177:19			
178:13 - 178:22			
179:1 - 179:2		179:3 - 179:6	ARG; NR
179:8 - 180:4		180:5 - 180:6	ARG; NR
	Relevance,		
180:8 - 180:20	F.R.E. 401		
	Relevance,		
183:11 - 184:16	F.R.E. 401		
184:17 - 185:15	Relevance, F.R.E. 401		
	Lack of		
	foundation/sp		
	eculation,		
	F.R.E. 602;		
	relevance,		
187:8 - 189:22	F.R.E. 401		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion, F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
190:1 - 190:17	F.R.E. 702		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements of F.R.E. 703.		
	01 F.R.E. 705. . Witness'		
	testimony		
	about his		
	general		
	understandin		
	g is		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		D. I
	Lack of		F; I;
	foundation/sp eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602		
	and hearsay,		
	F.R.E. 801.		
	Witness'		
	testimony is		
	irrelevant,		
190:18 - 192:8	F.R.E. 401.	194:3-10	

	T		
Jeffrey Lenberg		Defendants'	Plaintiffs'
- November 21,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	Objections
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	and improper		
	lay witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	. Witness'		
	testimony		
	about his		
	general		
	understandin		
	g is		
	irrelevant,		
	F.R.E. 401,		
	and is based		
	on hearsay,		
202:14 - 202:22	F.R.E. 801.		

Jeffrey Lenberg		D 0 1 1 1	D1 1 100 1
- November 21,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
3	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	and improper		
	lay witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	. Witness'		
	testimony is		
	irrelevant,		
	F.R.E. 401,		
	and is based		
	on hearsay,		
203:1 - 204:22	F.R.E. 801.		
	Lack of		
	foundation,		
	F.R.E. 602,		
	lack of		
	authenticatio		
	n and		
	identification		
206:2 - 206:3	by the		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	witness,		
	F.R.E. 901.		
	Lack of		
	foundation,		
	F.R.E. 901.		
	Testimony is		
	irrelevant,		
207:13 - 207:14	F.R.E. 401.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602.		
	Witness'		
	testimony is		
	irrelevant,		
	F.R.E. 401,		
	and is		
200 4 210 4	hearsay,		
209:4 - 210:4	F.R.E. 801.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge, F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
219:8 - 220:5	and the basis		

Jeffrey Lenberg - November 21, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	C 1	C , ,	,
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	. Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Impermissibl		
	y seeks a		
	legal		
	conclusion,		
	F.R.E. 701		
	and and		
	seeks opinion		
	on ultimate		
	issue, F.R.E.		
	704.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
220:6 - 220:19	opinion,		

T 00 T 1			
Jeffrey Lenberg	D 0 1	Defendants'	Plaintiffs'
- November 21,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	. Witness'		
	testimony is		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Impermissibl		
	y seeks a		
	legal		
	conclusion,		
	F.R.E. 701		
	and and		
	seeks opinion		
	on ultimate		
	issue, F.R.E.		
	704.		

Jeffrey Lenberg - November 21,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations	Objection(s)	Designation(s)	Objections
Designations	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	. Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Impermissibl		
	y seeks a		
222:20 - 223:20	legal		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	conclusion, F.R.E. 701 and and seeks opinion on ultimate issue, F.R.E. 704.		
	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Witness' testimony is vague, based on hearsay, F.R.E. 801,		
224:15 - 224:20	irrelevant,		

Jeffrey Lenberg	D. C 1	Defendants'	Plaintiffs'
- November 21,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations	EDE 401		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion, F.R.E. 403.		
	F.N.E. 405.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
005.15 000.10	of F.R.E. 703.		
225:15 - 226:19			LAD
	Lack of		I; NR
	foundation/sp		
	eculation/per		
	sonal		
040.10 040.10	knowledge,	040.0 0 040.11 15	
240:18 - 240:19	F.R.E. 602;	240:2-6, 240:11-15	

Jeffrey Lenberg - November 21,	Defendants'	Defendants' Counter-	Plaintiffs' Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations	1	Dosignation(s)	o sjections
	and witness'		
	testimony is		
	based on		
	hearsay,		
	F.R.E. 801		
	and is		
	irrelevant,		
	F.R.E. 401.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	and witness'		
	testimony is		
	based on		
	hearsay,		
	F.R.E. 801		
	and is		
	irrelevant,		
240:21 - 241:11	F.R.E. 401.		
249:5 - 249:20		246:5-8, 247:15-20	I; NR
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	and witness'		
	testimony is		
	based on		
	hearsay,		
	F.R.E. 801		
	and is		
	irrelevant,		
251:15 - 252:22	F.R.E. 401.		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; and witness' testimony is based on hearsay, F.R.E. 801 and is irrelevant,		
253:1 - 255:10	F.R.E. 401. Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Question has been asked and answered and is argumentativ e F.R.E. 403 and is		
255:11 - 256:4	leading F.R.E. 611.		

тее т 1			
Jeffrey Lenberg	D 6 1	Defendants'	Plaintiffs'
- November 21,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations		(~)	5 % j c c c c c c
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	. Question		
	has been		
	asked and		
	answered		
	and is		
	argumentativ		
	e F.R.E. 403		
	and is		
	leading		
256:5 - 259:8	F.R.E. 611.		

Jeffrey Lenberg		D 6 1 4 1	D1
- November 21,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations	, , ,	Designation(s)	Objections
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	. Question		
	has been		
	asked and		
	answered		
	and is		
	argumentativ		
	e, F.R.E. 403		
	and is		
250 10 250 55	leading		
259:16 - 259:22	F.R.E. 611.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
260:1 - 260:7	knowledge,		

Jeffrey Lenberg		D 0 1 1 1	D1 1 1100 1
- November 21,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701.		
	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
260:12 - 262:4	the		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	requirements		
	of F.R.E. 703.		
	Witness'		
	testimony is		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Lack of		S; NR; F
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701,		
	seeks a legal		
	conclusion,		
	F.R.E. 701;		
	and seeks		
	opinion on		
	ultimate		
	issue, F.R.E.		
267:17 - 268:8	704.	268:9-20	
	The cited		
	portion		
	reflects an		
	incomplete		
050000500	answer, FRE		
270:2 - 272:8	106		-
274:2 - 274:5		271:7-12	I

Jeffrey Lenberg	D. C 1	Defendants'	Plaintiffs'
- November 21,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations	T 1 C		•
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701.		
	Witness'		
	testimony is		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
000 0 000 00	Hearsay,		
289:2 - 289:22	F.R.E. 801.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701.		
	Hearsay, F.R.E.		
	801.Witness'		
	testimony is		
200.1 201.15	irrelevant,		
290:1 - 291:15	F.R.E. 401.		

Jeffrey Lenberg			
- November 21,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602.		
	Witness'		
	testimony is		
	irrelevant,		
293:12 - 293:20	F.R.E. 401.		
	Witness'		
	testimony is		
	irrelevant,		
	F.R.E. 401.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701.		
	Hearsay,		
294:14 - 296:8	F.R.E. 801.		
	The cited		
	portion does		
	not		
	accurately		
	reflect a		
	complete		
	answer to the		
	question,		
296:13 - 296:13	FRE 106		

Jeffrey Lenberg		Defendants'	Plaintiffs'
- November 21,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701.		
	Hearsay,		
	F.R.E.		
	801.Witness'		
	testimony is		
	irrelevant,		
298:7 - 300:5	F.R.E. 401.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
201.14 200.1	the		
301:14 - 302:1	requirements		

Jeffrey Lenberg		Defendants'	Plaintiffs'
- November 21,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)		
Designations		Designation(s)	Objections
	of F.R.E. 703.		
	. Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Impermissibl		
	y seeks a		
	legal		
	conclusion,		
	F.R.E. 701.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
000 # 000 1 #	testimony		
302:5 - 302:17	does not meet		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	the		
	requirements		
	of F.R.E. 703.		
	. Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Impermissibl		
	y seeks a		
	legal		
	conclusion,		
	F.R.E. 701		
	and and		
	seeks opinion		
	on ultimate		
	issue, F.R.E.		
	704.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
304:2 - 304:10	has not been		

Jeffrey Lenberg - November 21, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	qualified as		
	an expert, F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	. Witness'		
	testimony is		
	vague, based		
	on hearsay, F.R.E. 801,		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Impermissibl		
	y seeks a		
	legal conclusion,		
	F.R.E. 701		
	and and		
	seeks opinion		
	on ultimate		
	issue, F.R.E.		
	704.		
		308:1-8, 309:18-22,	SCOPE; I; S; F;
305:5 - 305:10		310:4-18, 329:2-5	LO

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
8:3 - 8:4			
10:2 - 10:7			
	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602. Witness' testimony is based on hearsay, F.R.E. 801 (as he testified at 11:16-19) and is irrelevant, F.R.E. 401.	11:14-16 (ending	I; SCOPE; NR
10:19 - 11:5		at "math")	
12:2 - 12:11	Lack of foundation/sp eculation/per sonal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such		

Doug Logan – November 18, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter-	Plaintiffs' Counter
Designations		Designation(s)	Objections
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	and is		
	irrelevant,		
	F.R.E. 401.		
	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801, and is		
	irrelevant,		
13:3 - 13:9	F.R.E. 401.		
10.0 - 10.0	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	and is		
	irrelevant,		
	F.R.E. 401.		
	ness lacked		
	personal		
	knowledge of		
	who made		
	the hearsay		
	statements,		
13:15 - 14:21	F.R.E. 602.		

Doug Logan – November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations	, ,	Designation(s)	Objections
	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	and is		
	irrelevant,		
	F.R.E. 401.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
15:10 - 17:18	F.R.E. 602.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
99.95 94.19	of F.R.E. 703.		
22:25 - 24:12	Hearsay,		

Doug Logan -			
November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
Designations	F.R.E.		
	801.Witness'		
	testimony is		
	irrelevant,		
	F.R.E. 401.		
	F.R.D. 401.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge/pe		
	rsonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	. Hearsay,		
	F.R.E.		
	801.Witness'		
	testimony is		
	irrelevant,		
25:23 - 26:10	F.R.E. 401.		

Doug Logan -		D 0 1 . 1	D1 1 122 1
November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
J	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge/pe		
	rsonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Hearsay,		
	F.R.E.		
	801.Witness'		
	testimony is		
	irrelevant,		
	F.R.E. 401		
	and		
	constitutes a		
	legal		
	conclusion,		
27:7 - 27:16	F.R.E. 701.		

Doug Logan – November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
Designations	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Impermissibl		
20.9 22.11	y seeks a		
30:2 - 33:11	legal		

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	conclusion,		
	F.R.E. 701		
	and seeks		
	opinion on ultimate		
	issue, F.R.E.		
	704.		
	104.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602; improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
00.15 00.00	F.R.E. 801,		
33:17 - 33:22	irrelevant,		

Doug Logan -	Defendants'	Defendants'	Plaintiffs'
November 18,		Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Impermissibl		
	y seeks a		
	· •		
	legal conclusion,		
	F.R.E. 701		
	and seeks		
	opinion on		
	ultimate		
	issue, F.R.E.		
	704.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
35:21 - 36:5	requirements		

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	of F.R.E. 703.		
	Witness'		
	testimony is		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701.		
	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801, irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
44:19 - 45:10	F.R.E. 403.		

Doug Logan – November 18, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	T1 . C		-
	Lack of		
	foundation/sp		
	eculation/per sonal		
	knowledge,		
	F.R.E. 602		
	(witness testified that		
	he did not		
	know who the		
	attorney was		
	working for		
	45:25-46:3);		
	improper lay		
	witness		
	opinion, F.R.E. 701.		
	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is subject to		
	exclusion,		
45:11 - 45:24	F.R.E. 403.		
	F.IV.E. 400.		
46:8 - 46:10 46:14 - 46:23			
40.14 - 40.40	Witness'		
	testimony is		
	vague, based		
	on hearsay,		
	F.R.E. 801,		
47:11 - 48:2	irrelevant,		
41.11 - 40.4	irreievant,		

November 18, 2022 Deposition Designations Defendants' Counter- Designation(s) F.R.E. 401, and, even if relevant, is
Designations Designation(s) Designation(s) Objections
F.R.E. 401, and, even if
and, even if
relevant, is
subject to
exclusion,
F.R.E. 403.
Witness'
testimony is
based on
speculation,
F.R.E. 701
and hearsay,
F.R.E. 401
50:8 - 50:18 and 403.
Witness'
testimony is
based on
speculation,
F.R.E. 701
and hearsay,
F.R.E. 401
and 403 and
is improper
lay witness
opinion, F.R.E. 701
and witness
has not been
qualified as
an expert,
F.R.E. 702
and the basis
for such
testimony
meet the
requirements
51:11 - 54:17 of F.R.E. 703.

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	Lack of		
	foundation,		
	F.R.E. 901,		
	lack of		
	personal		
	knowledge,		
	F.R.E. 602		
	and improper		
	legal		
	conclusion,		
	F.R.E. 701.		
	Improper		
	testimony/co		
	mment by		
	questioning		
	attorney		
	should be		
	omitted.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 401		
	and 403 and		
	is improper		
	lay witness		
	opinion, F.R.E. 701.		
	Lack of		
	foundation,		
	F.R.E. 901		
	and lack of		
	personal		
	knowledge,		
55:3 - 56:5	F.R.E. 602.		

Doug Logan – November 18, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter-	Plaintiffs' Counter
Designations		Designation(s)	Objections
3	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702.		
	Witness'		S; LO
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 401		
	and 403 and		
	is improper		
	lay witness opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Lack of		
	foundation,		
	F.R.E. 901,		
	and lack of personal		
56:13 - 60:19	knowledge,	60:20-61:6.	

Doug Logan – November 18, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	F.R.E. 602		
	(see 60:20-		
	61:6).		
	Testimony is		
	irrelevant,		
	F.R.E. 401		
	and would		
	otherwise be		
	subject to		
	exclusion		
	under F.R.E.		
	403. The		
	testimony is		
	an improper		
	legal		
	conclusion,		
	F.R.E. 701		
	and states an		
	opinion on		
	the ultimate		
	issue, F.R.E.		
	704.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701.		
	Witness'		
	testimony		
	about his		
	general		
61:7 - 62:13	understandin		

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	g is		
	irrelevant, F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Lack of		
	foundation/sp		
	eculation/per		
	sonal		
	knowledge,		
	F.R.E. 602;		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701 and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
65:23 - 66:11	for such		

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Witness'		
	testimony		
	about his		
	general		
	understandin		
	g is		
	irrelevant,		
	F.R.E. 401,		
	and, even if		
	relevant, is		
	subject to		
	exclusion,		
	F.R.E. 403.		
	The cited		
	portion		
	reflects an		
	incomplete		
	answer, FRE		
	106 and is		
78:8 - 78:8	not relevant, F.R.E. 401.		
10.0 - 10.0	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R. E. 801		
	and is not		
	relevant,		
	F.R.E. 401		
84:18 - 86:8	and 403 and		

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	is improper		
	lay witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		T 110
	Witness'		I; NR
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay, F.R.E. 801		
	and is		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
07.15 00 5	testimony	05.1.0	
87:15 - 88:5	does not meet	95:1-6.	

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	the		
	requirements		
	of F.R.E. 703.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701, is		
	hearsay,		
	F.R.E. 801.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
91:3 - 92:3	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801		
	and is		
	improper lay witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
101:14 - 103:8	does not meet		

Doug Logan -		Defendants'	Plaintiffs'
November 18,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	
	the		
	requirements		
	of F.R.E. 703.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
107:8 - 107:11	F.R.E. 801.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
107:12 - 108:20	602.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
108:21 - 109:11	knowledge of		

Doug Logan -		D C 1 / 1	D1 ·
November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
	facts, F.R.E.		
	602.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
110:4 - 111:13	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
1101 1100	F.R.E. 401		
112:1 - 112:8	and 403.		

Doug Logan – November 18, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter-	Plaintiffs' Counter
Designations		Designation(s)	Objections
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
112:21 - 113:18	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
115.10 110.0	F.R.E. 401		
115:12 - 116:2	and 403. Witness'		
	testimony is based on		
117.8 - 117.95	speculation, F.R.E. 701		
117:8 - 117:25	r.n.e. /U1		

Doug Logan – November 18, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	1.1	= 02- g 00-0-(2)	0.0300010110
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E. 602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
119:2 - 119:7	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
1100 10017	personal		
119:8 - 120:15	knowledge of		

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and 403.		
121:11 - 121:15			
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
122:21 - 123:20	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801		
	and is		
	improper lay witness		
	opinion, F.R.E. 701		
	and witness		
124:11 - 124:15	has not been		

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	qualified as		
	an expert, F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements of F.R.E. 703.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and 403.		
	Witness'		
	testimony is		
	based on speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801		
	and is		
	improper lay		
	witness		
	opinion, F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony does not meet		
	the		
124:24 - 126:5	requirements		

Doug Logan – November 18, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter-	Plaintiffs' Counter
Designations		Designation(s)	Objections
	of F.R.E. 703.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801		
	and is		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and/or is		
1000 1070	subject to		
126:6 - 127:9	exclusion		

Doug Logan -			
November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
Dosignations	under F.R.E.		
	403.		
	100.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801		
	and is		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
128:18 - 130:12	and 403.		

Doug Logan – November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations	Objection(s)	Designation(s)	Objections
Designations	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801		
	and is		
	improper lay		
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Testimony is		
	not relevant,		
1001 10011	F.R.E. 401		
132:1 - 133:11	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation, F.R.E. 701		
	and hearsay,		
	F.R.E. 801		
	and is		
135.23 - 136.8			
135:23 - 136:8	and is improper lay		

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	witness		
	opinion,		
	F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
	and the basis		
	for such		
	testimony does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation, F.R.E. 701		
	and hearsay,		
	F.R.E. 801		
	and is		
	improper lay		
	witness		
	opinion, F.R.E. 701		
	and witness		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702		
137:4 - 137:20	and the basis		

Doug Logan -		D 6 1 . 1	D1
November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations	·	Designation(s)	Objections
	for such		
	testimony		
	does not meet		
	the		
	requirements		
	of F.R.E. 703.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
137:21 - 138:24	F.R.E. 401 and 403.		
157.21 - 156.24	Witness is		
	giving an		
	inadmissible		
	opinion as he		
	has not been		
	qualified as		
	an expert,		
139:24 - 140:16	F.R.E. 702.		

Doug Logan -		Defendants'	Plaintiffs'
November 18,	Defendants'	Counter-	Counter
2022 Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	Objections
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
148:7 - 149:2	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
149:19 - 151:1	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
155:25 - 157:4	F.R.E. 701		

Doug Logan -			
November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and 403.		
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and 403. The		
	cited portion		
	also includes		
	improper and		
	inadmissible		
	statements or		
	testimony by		
	the		
	questioning		
167:24 - 169:21	attorney.		

Doug Logan – November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter Objections
Designations		Designation(s)	Objections
	Witness'		
	testimony is		
	based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and subject to		
	exclusion		
188:8 - 190:16	F.R.E. 403.		
	Lack of		
	foundation as		
	exhibit was		
	not properly		
	authenticated		
	or identified,		
195:4 - 195:8	F.R.E. 901.		
	Lack of		
	foundation,		
	F.R.E. 901,		
	hearsay,		
	F.R.E. 801,		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
1000 1000	Testimony is		
196:2 - 196:7	not relevant,		

Doug Logan -		D 0 1	D1 4 .4.00 4
November 18,	Defendants'	Defendants'	Plaintiffs'
2022 Deposition	Objection(s)	Counter-	Counter
Designations		Designation(s)	Objections
Designations	F.R.E. 401		
	and subject to		
	exclusion		
	F.R.E. 403.		
	Witness is		
	giving an		
	inadmissible		
	opinion as he		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702.		
	Lack of		
	foundation,		
	F.R.E. 901,		
	hearsay,		
	F.R.E. 801,		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.		
	Testimony is		
	not relevant,		
	F.R.E. 401		
	and subject to		
	exclusion		
	F.R.E. 403.		
	Witness is		
	giving an		
	inadmissible		
	opinion as he		
	has not been		
	qualified as		
	an expert,		
196:11 - 197:14	F.R.E. 702.		

Doug Logan – November 18, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter
Designations		Designation(s)	Objections
Designations	Lack of foundation, F.R.E. 901, hearsay, F.R.E. 801, Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and subject to exclusion F.R.E. 403. Witness is giving an		
202:17 - 202:19	inadmissible opinion as he has not been qualified as an expert, F.R.E. 702.		
202:25 - 203:14	Lack of foundation, F.R.E. 901, hearsay, F.R.E. 801, Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401		

Doug Logan – November 18, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	and subject to		
	exclusion		
	F.R.E. 403.		
	Witness is		
	giving an		
	inadmissible		
	opinion as he		
	has not been		
	qualified as		
	an expert,		
	F.R.E. 702.		CCODE, ND. I. C
	Witness'		SCOPE; NR; I; S
	testimony is based on		
	speculation,		
	F.R.E. 701		
	and hearsay,		
	F.R.E. 801.		
	Witness lacks		
	personal		
	knowledge of		
	facts, F.R.E.		
	602.	209:21-210:11,	
	Testimony is	210:20-22, 212:22-	
	not relevant,	213:3, 213:20-24,	
	F.R.E. 401	221:19-222:3,	
207:9 - 207:17	and 403.	223:8-17	

Jil Ridlehoover - August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
8:20 - 8:22			
11:19 - 11:22			

Jil Ridlehoover - August 16, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations			
15:6 - 15:18	In some alots		
10.0 10.11	Incomplete.	10.00 17.7	
16:8 - 16:11	F.R.E. 106.	16:22-17:7	
17:2 - 17:3	Incomplete. F.R.E. 106.	16:22-17:7	
	Testimony is		
	individually		
	and		
	collectively		
	either		
	irrelevant.		
	(F.R.E. 401) or		
	subject to		
	exclusion due		
	to confusion of		
	issues,		
	cumulative,		
	and minimal		
	(if any)		
	probative		
	value (F.R.E.		
	403) because		
	the witness		
	cannot		
	provide		
	probative		
	testimony		
	regaarding		
	election-day		
	activities that		
	are outside		
	the scope of		
	the witness's		
	personal		
22.0	knowledge		
22:9 - 29:3	specifying her		

Jil Ridlehoover - August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	scope of prior employment		
	(F.R.E. 602) in		
	response to		
	questions that		
	are		
	impermissibly		
	vague,		
	misleading,		
	and confusing questions		
	(F.R.E. 403)		
	that misstate		
	the		
	evidence/testi		
	mony, lack		
	foundation		
	(F.R.E. 901), call for		
	speculation		
	(F.R.E. 701),		
	and seeks		
	improper		
	opinion/unfou		
	nded		
	conclusions		
	(F.R.E. 701- 02).		

Jil Ridlehoover - August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	Testimony is individually and collectively either irrelevant (F.R.E. 401), or subject to exclusion due to confusion of issues, cumulative, and minimal (if any) probative value (F.R.E. 403) because the witness cannot provide probative testimony regaarding	Designation(s)	Objections
31:3 - 34:20	election-day activities that are outside the scope of the witness's personal knowledge specifying her scope of prior employment (F.R.E. 602) in response to questions that		

Jil Ridlehoover - August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	are impermissibly vague, misleading, and confusing questions (F.R.E. 403) that misstate the evidence/testi mony, lack foundation (FRE 901), call for speculation (F.R.E. 701), and seeks improper opinion/unfounded conclusions.		
46:16 - 50:22	F.R.E. 701-02. Testimony is individually and collectively either irrelevant (F.R.E. 401), or subject to exclusion due to confusion of issues, cumulative, and minimal (if any)		

Jil Ridlehoover - August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	probative value (F.R.E. 403) because the witness cannot provide probative testimony regaarding election-day activities that are outside the scope of the witness's personal knowledge specifying her scope of prior employment (F.R.E. 602) in response to questions that are impermissibly vague, misleading, and confusing questions (F.R.E. 403) that misstate the evidence/testi mony, lack foundation (FRE 901), call for		

Jil Ridlehoover - August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	speculation (F.R.E. 701), and seeks improper opinion/unfou nded conclusions. F.R.E. 701-02.		
51:12 - 53:18	Relevance, F.R.E. 401.		
F4.5. F4.15	Question seeks testimony regarding the content of out- of-court verbal statements that constitute hearsay pursuant to		
54:7 - 54:17	FRE 801 Hearsay. F.R.E. 803.		
55:6 - 55:15 63:4 - 64:10 65:7 - 65:11	Hearsay. F.R.E. 803.		
65:15 - 66:2 66:11 - 66:21 67:13 - 67:19			

Jil Ridlehoover - August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
68:7 - 68:22			
69:1 - 69:9			
73:8 - 74:4			
73:8 - 74:4	Answer to question (71:1-4) is compound (F.R.E. 403/611(a)), vague, misleading, and confusing question (F.R.E. 403) that lacks foundation (FRE 901), calls for speculation (F.R.E. 701), and seeks improper opinion/unfou nded conclusions (F.R.E. 701-02), and otherwise seeks testimony this outside the scope of the witness's personal		
74:6 - 74:10	knowledge. F.R.E. 602.		

Jil Ridlehoover		Defendants'	Plaintiffs'
– August 16, 2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	Objections
	<u>75:2-15</u> :		
	improper lay		
	witness		
	describing		
	portions of		
	video that		
	speaks for		
	itself under		
	Best Evidence		
	Rule (FRE		
74:19 - 75:18	1001)		
82:15 - 83:17			
	Question is		
	compound		
	(F.R.E.		
	403/611(a)),		
	vague,		
	misleading,		
	and confusing questions		
	(F.R.E. 403)		
	that misstate		
	the		
	evidence/testi		
	mony, lack		
	foundation		
	(F.R.E. 901),		
	calls for		
	speculation		
	(F.R.E. 701),		
	seeks		
	improper		
	opinion/unfou		
	nded		
	conclusions		
84:22 - 85:4	(F.R.E. 701-		

Jil Ridlehoover			
- August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	02), and otherwise seeks		
	testimony this outside the scope of the witness's		
	personal knowledge (F.R.E. 602).		
	Questions are compound (F.R.E. 403/611(a)),		
	vague, misleading, and confusing (F.R.E. 403) lack		
	foundation (F.R.E. 901), calls for speculation		
	(F.R.E. 701), and seeks improper opinion/unfou nded		
88:15 - 89:16	conclusions (F.R.E. 701- 02).		
89:21 - 90:1	~ - /·		
90:2 - 90:20			
95:20 - 96:20			
97:2 - 97:6			
97:21 - 99:7			

Jil Ridlehoover - August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
99:17 - 100:1			
101:9 - 101:11			
101:15 - 101:17			
134:22 - 135:13			
134:22 - 135:13	136:14-17, 136:20: Answer to question that is compound (F.R.E. 403/611(a)), vague, misleading, and confusing questions (F.R.E. 403) that misstate the evidence/testi mony, lack foundation (F.R.E. 901), calls for speculation (F.R.E. 701), seeks improper opinion/unfou nded conclusions (F.R.E. 701- 02), and		
136:7 - 136:17	otherwise seeks testimony this outside the		

Jil Ridlehoover - August 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	scope of the witness's personal knowledge (F.R.E. 602).		
136:20 - 137:8			
138:22 - 139:20			
140:2 - 140:13			
140:16 - 143:6			
147:14 - 152:10			
160:6 - 160:9			
161:3 - 161:5			
165:12 - 166:11			
168:4 - 169:20			
171:5 - 171:10			
171:19 - 172:13			
175:14 - 175:21			
176:2 - 176:4			
176:10 - 176:10			
	Cumulative/A sked and Answered.		
177:8 - 178:2	F.R.E. 403.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
10:1 - 10:3			

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
11:25 - 12:3			
15.0 15.20	Lack of foundation/spe culation, F.R.E. 602; Relevance,		
15:9 - 15:20	F.R.E. 401. Lack of foundation/spe culation, F.R.E. 602; Relevance,		
17:14 - 18:5	F.R.E. 401.		ADG ND
	Lack of foundation/spe culation, F.R.E. 602; Relevance,		ARG; NR
19:21 - 19:23	F.R.E. 401.	19:21-20:18	
	Lack of foundation/spe culation, F.R.E. 602; Relevance,		
20:4 - 20:18	F.R.E. 401. Relevance,		
20:22 - 21:8	F.R.E. 401.		
23:10 - 24:8	Relevance, F.R.E. 401.		ADG MD
24:9 - 25:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited	24:9-25:5	ARG; NR

Wendell Stone -			D1 4 .400 4
September 1,	Defendants'	Defendants' Counter-	Plaintiffs' Counter
2022 Deposition	Objection(s)	Designation(s)	
Deposition Designations		Designation(s)	Objections
Designations	portion reflects		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
25:4 - 25:5	statement.		
	Relevance,		
26:12 - 26:19	F.R.E. 401.		
	Relevance,		
27:5 - 27:8	F.R.E. 401.		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
27:22 - 27:25	statement.		4 D G 14 D
	Lack of		ARG; NR
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401; and the cited		
	portion reflects an incomplete		
28:2 - 28:13	statement.	27:22-28:18	
20,2 - 20,10	Lack of	21,22-20.10	
	foundation/spe		
28:15 - 28:18	culation,		
20.10 20.10	Januaron,	<u>l</u>	1

Wendell Stone – September 1,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition		Designation(s)	Objections
Designations	DD D and		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
	statement.		
	Relevance,		F; ARG
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
28:22 - 29:1	statement.	28:22-29:11	
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
29:3 - 29:11	statement.		
	Relevance,		
31:3 - 31:14	F.R.E. 401.		
	Relevance,		
31:19 - 31:21	F.R.E. 401.		
	Relevance,		
32:6 - 33:4	F.R.E. 401.		
	Relevance.		
	F.R.E. 401;		
	Calls for		
	speculation.		
33:15 - 34:4	F.R.E. 602.		
	Relevance.		
	F.R.E. 401;		
	Calls for		
	speculation.		
36:5 - 37:5	F.R.E. 602.		

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	Relevance.		
	F.R.E. 401;		
	Calls for		
	speculation.		
37:13 - 39:2	F.R.E. 602.		
	Relevance.		
39:17 - 40:1	F.R.E. 401.		
	Relevance.		
40:21 - 41:19	F.R.E. 401.		
	Relevance.		
42:10 - 42:18	F.R.E. 401.		
	Relevance.		
	F.R.E. 401;		
	Calls for		
	speculation.		
42:19 - 43:21	F.R.E. 602.		
	Relevance.		
	F.R.E. 401;		
	Calls for		
	speculation.		
43:22 - 44:19	F.R.E. 602.		
	Relevance.		
	F.R.E. 401;		
	Calls for		
44.00 40.11	speculation.		
44:20 - 46:11	F.R.E. 602.		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
49.90 40.1	an incomplete	10.91 10.1	
48:20 - 49:1	statement. Lack of	48:24-49:1	
	foundation/spe		
40.2 40.14	culation,		
49:3 - 49:14	F.R.E. 602;		

Wendell Stone -		D 6 1 4 1	D1
September 1, 2022	Defendants'	Defendants' Counter-	Plaintiffs' Counter
Deposition 2022	Objection(s)	Designation(s)	Objections 0
Designations		Designation(s)	Objections
2 02-9	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects an incomplete		
50:7 - 50:16	statement.		
00.7 - 00.10	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
50:21 - 50:25	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
E0.0 E0.10	an incomplete		
98:0 - 98:13			
	_		
59.4 - 59.20			
58:6 - 58:13 59:4 - 59:20	statement. Lack of foundation/spe culation, F.R.E. 602;		

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022		Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	Relevance,		
	F.R.E. 401.		
	Lack of		CM; I
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
67:2 - 67:12	F.R.E. 401.	67:7-67:12	
	Relevance,		
67:17 - 68:11	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
69:5 - 69:10	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
71:9 - 71:18	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
71.10 71.10	an incomplete		
71:19 - 71:19	statement.		
	Lack of		
	foundation/spe		
79.5 79.10	culation,		
72:5 - 73:10	F.R.E. 602;		

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022		Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,	- 40 - 400	
74:9 - 75:7	F.R.E. 401.	74:9-74:22	
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance, F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
75:13 - 75:15	statement.		
70.10 - 70.10	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
75:19 - 76:9	statement.		
	Lack of		
	foundation/spe		
	culation,		
77:1 - 77:4	F.R.E. 602;		

Wendell Stone -			
September 1,		Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		8 ()	y
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
77:7 - 77:13	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
01.9 01.7	an incomplete		
81:3 - 81:7	statement. Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
81:9 - 81:12	statement.		

Wendell Stone -			
September 1,	Defendants'	Defendants' Counter-	Plaintiffs' Counter
2022 Deposition	Objection(s)	Counter- Designation(s)	Objections
Designations		Designation(s)	Objections
Designations	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
81:18 - 82:3	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
82:5 - 82:13	an incomplete statement.		
02.0 - 02.10	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
82:15 - 83:5	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
00.7	Relevance,		
83:7 - 83:9	F.R.E. 401;		

Wendell Stone - September 1,		Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		= 001g-1001011(8)	0.0,00010110
6 111 1	and the cited		
	portion reflects		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
86:5 - 86:19	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
87:9 - 87:25	F.R.E. 401.		
	Relevance,		
89:2 - 89:16	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
89:23 - 91:5	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
01 11 01 00	Relevance,		
91:11 - 91:22	F.R.E. 401.		
00.10.00.0	Lack of		
92:19 - 96:3	foundation/spe		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	culation,		
	F.R.E. 602; Relevance,		
	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
97:10 - 97:15	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602; Relevance,		
97:23 - 98:1	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
99:20 - 100:4	F.R.E. 401.		
	Lack of		
	foundation/spe culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
100:10 - 100:13	statement.		
	Lack of		
	foundation/spe		
101 0 100 1	culation,		
101:8 - 102:1	F.R.E. 602;		

Wendell Stone -			
September 1,		Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		(-)	0.00
3	Relevance,		
	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
102:13 - 102:20	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
102:22 - 103:2	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
103:4 - 104:3	statement.		
	Lack of		
	foundation/spe		
104 5 104 00	culation,		
104:5 - 104:23	F.R.E. 602;		

Wendell Stone – September 1,		Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		8 ()	J
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
	statement.		
	Relevance,		
105:7 - 105:12	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
10014 10010	Relevance,		
106:14 - 108:18	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602; Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
110:24 - 111:2	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
111:25 - 112:12	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
11404 1100	Relevance,		
114:25 - 116:8	F.R.E. 401.		

Wendell Stone -			
September 1, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations			
	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited		
126:10 - 126:20	portion reflects an incomplete statement.		
	Lack of foundation/spe culation, F.R.E. 602;		
	Relevance, F.R.E. 401; and the cited portion reflects		
129:11 - 129:11	an incomplete statement.		
	Lack of foundation/spe culation, F.R.E. 602; Relevance,		
129:14 - 129:21	F.R.E. 401.		
	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete		
129:23 - 130:20	statement.		

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
130:24 - 131:13	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
133:7 - 134:2	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
135:11 - 136:8	statement.	136:4-136:8	
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
136:10 - 136:14	statement.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
145:11 - 145:18	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	145:11-145:16	
153:20 - 154:4	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
154:6 - 154:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
155:4 - 155:22	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.	155:4-155:8	
155:23 - 156:22	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022	_ = ===================================	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
156:24 - 157:1	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
166:15 - 168:5	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
100 0 100 10	an incomplete		
169:6 - 169:12	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401; and the cited		
	portion reflects		
160.14 160.94	an incomplete	160.91 160.94	
169:14 - 169:24	statement.	169:21-169:24	

Wendell Stone -			
September 1,	D 0 1	Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		8 ()	J
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
185:13 - 187:5	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
189:13 - 189:18	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
100.01 100.0	an incomplete		
189:21 - 190:6	statement.		
	Lack of foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
197:24 - 198:10	statement.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Lack of		
	foundation/spe culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
198:12 - 199:14	statement.		
	Relevance,		
200:3 - 200:18	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
200:19 - 204:9	Relevance, F.R.E. 401.		
200.19 - 204.9	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
204:12 - 204:21	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	*		
	_		
205.17 206.1	_		
205:17 - 206:1	foundation/spe		

Wendell Stone -			
September 1, 2022	Defendants'	Defendants' Counter-	Plaintiffs' Counter
Deposition 2022	Objection(s)	Designation(s)	Objections
Designations		Designation (s)	
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
0000 00010	an incomplete		
206:3 - 206:18	statement.		
	Lack of		
	foundation/spe		
	culation, F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
206:22 - 207:12	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
20714 2227	an incomplete		
207:14 - 209:5	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602; Relevance,		
212:6 - 212:19	F.R.E. 401.		
414.0 - 414.19	г. к. ъ. 4 01.		

Wendell Stone – September 1, 2022	Defendants' Objection(s)	Defendants' Counter-	Plaintiffs' Counter
Deposition		Designation(s)	Objections
Designations	D.1		
218:18 - 218:25	Relevance, F.R.E. 401.		
10:1 - 10:3	F.R.E. 401.		
11:25 - 12:3			
11,20 - 12.0	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
15:9 - 15:20	F.R.E. 401.		
10.0 10.20	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
17:14 - 18:5	F.R.E. 401.		
	Lack of		ARG; NR
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
19:21 - 19:23	F.R.E. 401.	19:21-20:18	
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
20:4 - 20:18	F.R.E. 401.		
20.00.01.0	Relevance,		
20:22 - 21:8	F.R.E. 401.		
00.10 04.0	Relevance,		
23:10 - 24:8	F.R.E. 401.		ADC ND
	Lack of		ARG; NR
	foundation/spe		
04.0 07.1	culation,	04.0 05.5	
24:9 - 25:1	F.R.E. 602;	24:9-25:5	

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602; Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
25:4 - 25:5	statement.		
2017 2010	Relevance,		
26:12 - 26:19	F.R.E. 401.		
	Relevance,		
27:5 - 27:8	F.R.E. 401.		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
27:22 - 27:25	statement.		
	Lack of		ARG; NR
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401; and the cited		
	portion reflects		
	an incomplete		
28:2 - 28:13	statement.	27:22-28:18	
40.4 - 40.10	statement.	41.44-40.10	

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022		Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
28:15 - 28:18	statement.		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
28:22 - 29:1	statement.	28:22-29:11	
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
29:3 - 29:11	statement.		
	Relevance,		
31:3 - 31:14	F.R.E. 401.		
	Relevance,		
31:19 - 31:21	F.R.E. 401.		
	Relevance,		
32:6 - 33:4	F.R.E. 401.		
	Relevance.		
	F.R.E. 401;		
	Calls for		
00.15 04.4	speculation.		
33:15 - 34:4	F.R.E. 602.		
	Relevance.		
	F.R.E. 401;		
36:5 - 37:5	Calls for		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	speculation. F.R.E. 602.		
	Relevance.		
	F.R.E. 401;		
	Calls for		
	speculation.		
37:13 - 39:2	F.R.E. 602.		
	Relevance.		
39:17 - 40:1	F.R.E. 401.		
	Relevance.		
40:21 - 41:19	F.R.E. 401.		
42:10 - 42:18	Relevance. F.R.E. 401.		
	Relevance.		
	F.R.E. 401;		
	Calls for		
	speculation.		
42:19 - 43:21	F.R.E. 602.		
	Relevance.		
	F.R.E. 401;		
	Calls for		
43:22 - 44:19	speculation. F.R.E. 602.		
40.22 - 44.15	Relevance.		
	F.R.E. 401;		
	Calls for		
	speculation.		
44:20 - 46:11	F.R.E. 602.		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
40.00 40.1	an incomplete		
48:20 - 49:1	statement.		

Wendell Stone -			
September 1, 2022	Defendants'	Defendants' Counter-	Plaintiffs' Counter
Deposition 2022	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	Objections
Designations	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
49:3 - 49:14	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
50:7 - 50:16	an incomplete statement.		
50.7 - 50.10	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
50:21 - 50:25	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
E0.0 E0.10	an incomplete		
58:6 - 58:13	statement.		

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
FO 4 FO 90	Relevance,		
59:4 - 59:20	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation, F.R.E. 602;		
	Relevance,		
67:2 - 67:12	F.R.E. 401.		
07.2 07.12	Relevance,		
67:17 - 68:11	F.R.E. 401.		
01111 00111	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
69:5 - 69:10	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
71:9 - 71:18	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance, F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
71:19 - 71:19	statement.		
11.10 11.10	Statement.		

Wendell Stone – September 1, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations		6 ()	,
5	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
72:5 - 73:10	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
74:9 - 75:7	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance, F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
75:13 - 75:15	statement.		
70.10 - 70.10	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
75:19 - 76:9	statement.		

Wendell Stone -		D 0 1	D1 + + + + + + + + + + + + + + + + + + +
September 1, 2022	Defendants'	Defendants' Counter-	Plaintiffs' Counter
Deposition 2022	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	Objections
5	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
77:1 - 77:4	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401; and the cited		
	portion reflects		
	an incomplete		
77:7 - 77:13	statement.		
77.77.10	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
81:3 - 81:7	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
01.0 01.10	Relevance,		
81:9 - 81:12	F.R.E. 401;		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	and the cited		
	portion reflects		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
81:18 - 82:3	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
82:5 - 82:13	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401; and the cited		
	portion reflects		
89.15 - 89.5	an incomplete statement.		
82:15 - 83:5	statement.		

Wendell Stone - September 1,		Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		- 12-g(3)	5 12 3 5 5 5 5 5 5
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
83:7 - 83:9	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
86:5 - 86:19	F.R.E. 401.	86:5-87:8	
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
87:9 - 87:25	F.R.E. 401.		
00 0 00 10	Relevance,		
89:2 - 89:16	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602; Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
89:23 - 91:5	statement.		
01.0	Lack of		
91:11 - 91:22	foundation/spe		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	culation, F.R.E. 602;		
	Relevance,		
	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
92:19 - 96:3	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
97:10 - 97:15	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
97:23 - 98:1	Relevance,		
91.20 - 90.1	F.R.E. 401. Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
99:20 - 100:4	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
100.10 100.10	and the cited		
100:10 - 100:13	portion reflects		

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations	_		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
101:8 - 102:1	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
102:13 - 102:20	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
102:22 - 103:2	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
100 4 104 2	F.R.E. 401;		
103:4 - 104:3	and the cited		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	portion reflects		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
104:5 - 104:23	statement.		
	Relevance,		
105:7 - 105:12	F.R.E. 401.		
	Lack of		ARG; NR; S
	foundation/spe		
	culation,		
	F.R.E. 602;		
106:14 - 108:18	Relevance, F.R.E. 401.	108:19-109:21	
100.14 - 100.10	Lack of	100.10-100.21	
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
110:24 - 111:2	statement.		
	Lack of		
	foundation/spe		
111.95 119.19	culation,		
111:25 - 112:12	F.R.E. 602;		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance, F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
114:25 - 116:8	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
100.10 100.00	an incomplete		
126:10 - 126:20	statement. Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
129:11 - 129:11	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
100 14 100 01	Relevance,		
129:14 - 129:21	F.R.E. 401.		

Wendell Stone -			
September 1, 2022 Deposition	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations		3 (,	,
_	Lack of foundation/spe culation, F.R.E. 602; Relevance,		
100.00 100.00	F.R.E. 401; and the cited portion reflects an incomplete		
129:23 - 130:20	Lack of foundation/spe		
	culation, F.R.E. 602; Relevance,		
	F.R.E. 401; and the cited portion reflects an incomplete		
130:24 - 131:13	statement.		
	Lack of foundation/spe culation, F.R.E. 602; Relevance,		
133:7 - 134:2	F.R.E. 401.		
	Lack of foundation/spe culation,		
	F.R.E. 602; Relevance,		
	F.R.E. 401; and the cited portion reflects		
135:11 - 136:8	an incomplete statement.		

Wendell Stone – September 1,		Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		g(-/	5 12 3 5 5 5 5 5 5
3	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
136:10 - 136:14	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
145:11 - 145:18	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
153:20 - 154:4	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
154.0 154.10	Relevance,		
154:6 - 154:12	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation, F.R.E. 602;		
	Relevance,		
155.4 155.99	· ·		
155:4 - 155:22	F.R.E. 401.		

Wendell Stone –			
September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
Designations	Lack of		
	foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete		
155:23 - 156:22	statement.		
156:24 - 157:1	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
166:15 - 168:5	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
169:6 - 169:12	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

Wendell Stone – September 1,	D - 6 14?	Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations			
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
169:14 - 169:24	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
185:13 - 187:5	F.R.E. 401.		
	Lack of		S; ARG
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
189:13 - 189:18	statement.	187:24-189:24	
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
100.01 100.0	an incomplete		
189:21 - 190:6	statement.		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Lack of		CM
	foundation/spe culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
197:24 - 198:10	statement.	194:6-195:10	
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
100.10 100.14	an incomplete		
198:12 - 199:14	statement.		
200:3 - 200:18	Relevance, F.R.E. 401.		
200.5 - 200.10	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
200:19 - 204:9	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
204:12 - 204:21	F.R.E. 401.	204:6-205:16	

Wendell Stone -			
September 1,	Defendants'	Defendants'	Plaintiffs'
2022	Objection(s)	Counter-	Counter
Deposition		Designation(s)	Objections
Designations	T 1 0		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
905.17 900.1	an incomplete		
205:17 - 206:1	statement. Lack of		
	foundation/spe		
	culation, F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
206:3 - 206:18	statement.		
200.0 200.10	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
206:22 - 207:12	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
207:14 - 209:5	F.R.E. 401;		

Wendell Stone – September 1, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	and the cited		
	portion reflects		
	an incomplete		
	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
212:6 - 212:19	F.R.E. 401.		
	Relevance,		
218:18 - 218:25	F.R.E. 401.		

Ed Voyles – November 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
16:11 - 16:13			
38:18 - 38:20	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
39:1 - 39:10	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		

Ed Voyles -			
November 16, 2022	Defendants'	Defendants' Counter-	Plaintiffs' Counter
Deposition	Objection(s)	Designation(s)	Objections 0
Designations		Designation(s)	Objections
2 colgiumono	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
44:13 - 44:19	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
01.0.0010	Relevance,		
61:2 - 62:18	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
62:19 - 63:12	Relevance, F.R.E. 401.		
02.19 - 05.12	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
68:2 - 69:15	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
70:1 - 70:7	portion reflects		

Ed Voyles -			D1 4 .400 4
November 16, 2022	Defendants'	Defendants' Counter-	Plaintiffs' Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		Designation(s)	Objections
	an incomplete		
	statement.		
	Lack of		
	foundation/spe culation,		
	F.R.E. 602;		
	Relevance,		
70:11 - 70:13	F.R.E. 401.		
70.11 - 70.15	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
70:14 - 74:2	F.R.E. 401.		
, , , , , , , , ,	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
74:9 - 74:13	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
74:17 - 75:13	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
78:9 - 78:13	F.R.E. 401.		1.50
	Lack of		ARG: NR;
5 0.01 5 0.10	foundation/spe	55 10 00 0	SCOPE
78:21 - 79:12	culation,	77:12-83:8	

Ed Voyles -			
November 16,		Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		2 conginuon(s)	
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
82:11 - 82:15	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
00.1000.0	an incomplete		
82:18 - 83:2	statement.		C
	Lack of		S
	foundation/spe		
	culation, F.R.E. 602;		
	Relevance,		
	F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
83:6 - 83:8	statement.	83:9-83:13	
	Lack of		
	foundation/spe		
83:14 - 83:16	culation,		

Ed Voyles – November 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	F.R.E. 602; Relevance,		
	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
00.2 00.10	Relevance,		
90:3 - 90:12	F.R.E. 401. Relevance,		ARG; NR
	F.R.E. 401;		AIG, NI
	and the cited		
	portion reflects		
	an incomplete		
90:18 - 90:21	statement.	90:18-91:15	
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance, F.R.E. 401;		
	and the cited		
	portion reflects		
	an incomplete		
91:4 - 91:15	statement.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
00.10.07.10	Relevance,		
93:16 - 95:19	F.R.E. 401.		
	Lack of		
	foundation/spe culation,		
97:5 - 97:18	F.R.E. 602;		

Ed Voyles – November 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Relevance, F.R.E. 401.		
98:18 - 99:16	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
109:2 - 109:4			
109:6 - 109:11	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
113:4 - 114:8	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
	Lack of foundation/spe culation, F.R.E. 602; Relevance,		
115:5 - 116:9	F.R.E. 401.		
120:7 - 120:17	Lack of foundation/spe culation, F.R.E. 602; Relevance, F.R.E. 401.		
121:9 - 121:10			
126:5 - 126:10			

Ed Voyles – November 16,		Defendants'	Plaintiffs'
2022	Defendants'	Counter-	Counter
Deposition	Objection(s)	Designation(s)	Objections
Designations		8 (7	3
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
126:11 - 128:3	F.R.E. 401.		ADG MD
	Lack of		ARG; NR
	foundation/spe		
	culation,		
	F.R.E. 602;		
140:12 - 142:16	Relevance, F.R.E. 401.	140:12-142:19	
140.12 - 142.10	Lack of	140.12-142.13	
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
142:19 - 143:7	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
144:1 - 144:17	F.R.E. 401.		
	Lack of		ARG; NR; S
	foundation/spe		
	culation,		
	F.R.E. 602;		
144.01 140 =	Relevance,	144.01 140.4	
144:21 - 146:5	F.R.E. 401.	144:21-148:4	
	Lack of		
	foundation/spe culation,		
	F.R.E. 602;		
	Relevance,		
146:8 - 147:13	F.R.E. 401.		

Ed Voyles – November 16, 2022 Deposition Designations	Defendants' Objection(s)	Defendants' Counter- Designation(s)	Plaintiffs' Counter Objections
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
149:7 - 150:13	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
155:21 - 156:14	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
165:1 - 166:5	F.R.E. 401.		
	F.R.E. 602;		
	Relevance,		
176:7 - 178:4	F.R.E. 401.		
	Lack of		
	foundation/spe		
	culation,		
	F.R.E. 602;		
	Relevance,		
178:8 - 178:17	F.R.E. 401.		

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, et al.

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

ATTACHMENT E-2

DEFENDANTS' DEPOSITION DESIGNATIONS
PLAINTIFFS' COUNTER-DESIGNATIONS
DEFENDANTS' OBJECTIONS TO COUNTER-DESIGNATIONS

Code	Objection
	Lawyer Argument or Colloquy. Plaintiffs object to this deposition
	designation because it is lawyer argument and not testimony of
ARG	the witness.
	Cumulative. Plaintiffs object to this deposition designation on
CD 4	the ground that it is duplicative and/or cumulative of other
CM	designations.
	Foundation. Plaintiffs object to this deposition designation on the
172	ground that the foundation necessary for its admission has not
F	been laid. (Fed. R. Evid. 602)
Н	Hearsay. Plaintiffs object to this deposition designation because it constitutes or contains hearsay. (Fed. R. Evid. 801-802)
	Incomplete. Plaintiffs object to this deposition designation
	because it does not contain the complete testimony. (Fed. R.
	Evid. 106) Plaintiffs generally objects to all designations that
_	include only part of a question and/or part of an answer, or that
I	do not include any question.
	Not Relevant. Plaintiffs object to this deposition designation
NR	because it is not relevant to any issue to be decided in this case. (Fed. R. Evid. 401-402)
	Lay Opinion. Plaintiffs object to this deposition designation
	because it constitutes or contains improper opinion by a lay
LO	witness. (Fed. R. Evid. 701-702)
	Non-Responsive Testimony. Plaintiffs object to this deposition
	designation because it includes statements that are not
NRT	responsive to the question asked.
	Speculative. Plaintiffs object to this deposition designation
	because it includes statements that are speculative as to matters
S	of fact or law.
	Beyond Scope of 30(b)(6) Notice or Topics. Plaintiffs object to this
	deposition designation because it is outside the scope of the
agonn	topics on which the witness was designated as a corporate
SCOPE	representative.
	FRE 403. Plaintiffs object to this deposition designation because
	any probative value it has is substantially outweighed by a
403	danger of one or more of the following: unfair prejudice,

	confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. (Fed. R. Evid. 403)
VA	Vague and Ambiguous. Plaintiffs object to this deposition designation because it includes vague and indefinite statements.
P	Privilege Objection. Plaintiffs object to this designation because it includes privilege objections or attempts to solicit privileged information.
L	Leading. Plaintiffs object as an improper leading question.
COM	Compound. The question is compound and thus not clear which question the deponent is answering.
BE	Best Evidence. Plaintiffs object to this question because it asks a witness to testify about the contents of an original writing, recording, or photograph where the original is available. (FRE 1002)
DE	,
LEGAL	Plaintiffs object to this question because it calls for a legal conclusion.

Andrew Appel - January 27, 2022	Plaintiffs' Counter	Plaintiffs' Objections	Defendants' Counter
Deposition	Designation	Objections	Designation
Designations			Objections
38:22-39:03			
40:23-41:04		VA	
41:05-08			
67:20–25	68:1-11	I	
	84:23-85:16,	I, VA	
85:17–21	85:22-87:11		
	97:5-8, 99:5-	I	Beyond the scope
	102:11		of examination,
			not responsive to
			designation FRE
			611; lacks
			relaibale
			methodology and
			unhelpful FRE
100:03-11			702 & 703; if

			admitted, then 95:9-97:4, 97:9- 99:2, 102:12-106:5 should also be admitted FRE 106
101:07– 11	97:5-8, 99:5- 102:11	I	Beyond the scope of examination, not responsive to designation FRE 611; lacks relaibale methodology and unhelpful FRE 702 & 703; if admitted, then 95:9-97:4, 97:9-99:2, 102:12-106:5 should also be admitted FRE 106

Dr. Alex Halderman -	Plaintiffs'	Plaintiffs'	Defendants'
November 17, 2021	Counter	Objections	Counter
Deposition	Designation		Designation
Designations			Objections
	30:12-16;	I, VA	Beyond the scope
	35:21-37:9		of examination,
			not responsive to
			designation FRE
			611; lacks
			relaibale
			methodology and
			unhelpful FRE
			702 & 703; if
			admitted, then
			33:11-34:4 & 35:6-
			35:20 should also
			be admitted FRE
30:17-33:10			106
33:11–34:4			
35:6-35:20			

Dr. Alex Halderman -	Plaintiffs'	Plaintiffs'	Defendants'
January 3, 2023	Counter	Objections	Counter
Deposition	Designation		Designation
Designations			Objections
		I, VA, NR,	
23:23-24:9		NRT	
		I, VA, NR,	
38:13-21		NRT	
		I, VA, NR,	
40:3-7		NRT	
		I, VA, NR,	
42:5-20		NRT	
		I, VA, NR,	
64:9-19		NRT	

Teresa Lynn Ledford -	Plaintiffs'	Plaintiffs'	Defendants'
June 24, 2019	Counter	Objections	Counter
Deposition	Designation		Designation
Designations			Objections
	36:18-37:7;	F, H, I, NR,	
37:8-38:4	38:22-39:1	VA	
49:8-22	49:23-50:8	F, H, I, NR	
		·	

Donna Curling -	Plaintiffs'	Plaintiffs'	Defendants'
January 19, 2022	Counter	Objections	Counter
Deposition	Designation		Designation
Designations			Objections
	11:7-9; 11:18	F, H, I, NR,	If admitted, then
		403, VA	11:10-17 should
			also be admitted
11:19-23			FRE 106
	11:7-9; 11:20	F, H, I, NR,	If admitted, then
		403, VA	11:10-18 should
			also be admitted
11:22-23			FRE 106
	11:24-12:3	F, H, I, NR,	
12:4-10		403	

13:2-8	12:21-22; 13:9- 17	F, H, I, NR	
16:24-17:5	35:20-36:22; 37:1-13; 87: 3- 9; 132:17-25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	Portions are not responsive to the designation FRE 611; includes hearsay 802; improper opinion testimony FRE 702 & 703; If admitted, then 37:14-15, 135:6-136:13, should also be admitted FRE 106
18:21-19:11	35:20-36:22; 37:1-13; 87: 3- 9; 129:9- 130:20; 132:17- 25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	Portions are not responsive to the designation FRE 611; includes hearsay FRE 802 improper opinion testimony FRE 702 & 703; If admitted, then 37:14-15, 135:6-136:13, 130:21-132:6 should also be admitted FRE 106
21:7-12	35:20-36:22; 37:1-13; 87: 3- 9; 129:9- 130:20; 132:17- 25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	Portions are not responsive to the designation FRE 611; includes hearsay FRE 802; improper opinion testimony FRE 702 & 703; If admitted, then 37:14-15, 135:6-136:13, 130:21-132:6 should also

			be admitted FRE 106
3 1 1	35:20-36:22; 37:1-13 87: 3-9; 129:9-130:20; 132:17-25; 133:1-16	ARG, CM, I, S, VA, LEGAL	"(35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (132:17-25) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice,

22:1	35:20-36:22; 37:1-13; 87: 3- 9; 129:9- 130:20; 132:17- 25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602." "(35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 403; Lack of foundation, F.R.E. 602; hearsay, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 602.
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			(133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602."
22:9-18	35:20-36:22; 37:1-13; 87: 3- 9; 129:9- 130:20; 132:17- 25; 133:1-16	ARG, CM, I, LO,S, VA, COM, LEGAL	(35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (132:17-25) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack

	35:20-36:22; 37:1-13; 87: 3- 9; 129:9- 130:20; 132:17- 25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	of foundation/specul ation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602. (35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602;
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23:5-9	35:20-36:22; 37:1-13; 87: 3- 9; 129:9- 130:20; 132:17- 25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602. (35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602;
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	35:20-36:22; 37:1-13; 87: 3- 9; 129:9- 130:20; 132:17- 25; 133:1-16	CM, F, H, I, LO, S, VA, LEGAL	hearsay, F.R.E. 802. (132:17-25) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602. (35:20-36:22) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (37:1-13) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a
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	42:24-43:4;	CM, F, H, I,	of foundation/specul ation, F.R.E. 602; hearsay, F.R.E. 802. (132:17-25) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602. (83:5-19) -
24:16-25:5	83:5-19; 133:1- 16	LO, S, VA, COM, LEGAL	Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack of foundation/specul ation, F.R.E. 602. (133:1-16) - Relevance, F.R.E. 401; Prejudice, confusing, distracting, or a waste of time, F.R.E. 403; Lack

			of
			foundation/specul
			ation, F.R.E. 602.
	42:24-43:4;	CM, F, H, I,	(83:5-19) -
	83:5-19	LO, S, VA,	Prejudice,
		LEGAL	confusing,
			distracting, or a
			waste of time,
			F.R.E. 403; Lack
			of
			foundation/specul
26:4-9		0.7.5.	ation, F.R.E. 602.
	42:24-43:4;	CM, F, H, I,	(83:5-19) -
	83:5-19	LO, S, VA,	Prejudice,
		LEGAL	confusing,
			distracting, or a
			waste of time,
			F.R.E. 403; Lack
			of foundation/angual
26:10-14			foundation/specul ation, F.R.E. 602.
20.10-14	30:5-16	F, H, I, NR,	Relevance, F.R.E.
	50.5-10	403	401; Prejudice,
		100	confusing,
			distracting, or a
			waste of time,
29:10-25			F.R.E. 403;
	30:5-16	F, H, I, NR,	Relevance, F.R.E.
		403	401; Prejudice,
			confusing,
			distracting, or a
			waste of time,
30:1-4			F.R.E. 403;
	30:5-16	F, H, I, NR,	Irrelevant, FRE
31:25-32:7		403	401
33:12-15			
34:15		I, NR, VA	
35:11-12		NR, 403	
35:8-10		NR, 403	
35:15-19	35:13-14	I, NR	
40:23-41:2		I, NR, 403	

41:7-12			
42:13-43:1	42: 3-7, 10	I, VA	
43:2-14	83:5-19	CM, I, S	Counter- designation is not related to designation; speculative, FRE 602
43:16-24	43:5-7; 43:10- 14; 85:5-19	H, I	Counter- designation is not related to designation; speculative, FRE 602
	44:22-45:1;	F, H, I, S,	
	45:5-21; 46:18-	VA	
45.00 40.17	47:4; 48:23-		
45:22-46:17	49:1; 77:2-6	TO II I C	
	46:17-47:1;	F, H, I, S, VA	
47:6- 48:22	48:23-49:1; 77:2-6	VA	
51:21-23	37:1-9	CM, F, H, I, S, LO, S, LEGAL	Speculative/lack of personal knowledge, FRE 602
51:24-52:5	37:1-9	CM, F, H, I, S, LO, S, LEGAL	Speculative/lack of personal knowledge, FRE 602; unrelated to designation
	52:17-18,	F, H, I	
52:14-16	52:24-53:5		
	35:20-36:22; 37:1-9; 87: 3-9	CM, F, H, I, S, LO, S, LEGAL	Speculative/lack of personal knowledge, FRE 602; unrelated to
56:10-15	F 0.40.01.70.7		designation
	58:18-24; 59:3	F, I, S, LO,	FRE 403 &
50.4 5		LEGAL	611(a):
59:4-5			Incomplete

		F, S, LO,	
59:7-11		LEGAL	
	62:22-63:3	F, H, I, NR,	
63:8-17		LO, S, VA	
	134:7-19;	F, H, I, S,	
	52:17-18; 52:	LO, VA	
	24-53:5; 64:13-	,	
65:3-7	65:2		
	37:1-9	CM, F, H, I,	FRE 602:
68:15-69:6		LO, S, VA	Speculation
	47:10-48:3;	F, H, I, S,	
	69:7-9; 70:4-5;	LO, S,	
69:10- 70:3	70:8-9	LEGAL	
	70:11-14;	F, H, I, S,	FRE 403 &
	70:18-20;	LO, LEGAL	611(a):
71:5-7	70:22-71:4		Incomplete
	70:11-14;	F, S, LO,	FRE 403 &
	70:18-20;	LEGAL,	611(a):
71:8-18	70:22-71:4	ARG, I	Incomplete
		CM, F, LO,	
72:2-3		LEGAL	
	72:11-72:16	CM, F, I,	
		LO,	
72:7-9		LEGAL, I	
	71:20-22;	CM, F, I, S,	FRE 403 &
	73:24-74:2	LO, LEGAL	611(a):
73:15-23			Incomplete
	74:10-11;	I	
74:3-9	74:14-19		
	70:4-5; 70:8-9;	CM, F, LO,	
77:2-6	76:3-77:1	S, I	
	79:5-79:8;	F, I, LO,S,	
79:1-4		VA, LEGAL	
	79:17-79:18,	F, I, VA, S,	
	79:20	LO,	
		LEGAL,	
79:9-15		ARG	
	53:9-15; 53:21-	VA, S, LO,	Not relevant to
	24; 54:4-8;	LEGAL,	the original
80:8-11	81:2-81:5; 81:9-	CM, I	designation

1	10; 82:9-12;		
	83:5-19		
	67:23-68:2;	VA, I, LO,	No objection to
	83:5-22; 84:4-8;	403, CM	85:12-17;
	85:12-17	100, 011	Defendants object
	00.12 11		to the remaining
			counter-
			designations as
			not relevant to
			the original
85:18-23			designation
	67:23-68:2;	VA, I, 403,	Not relevant to
	83:5-22; 84:4-8;	LO, CM	the original
85:5-11			designation
	67:23-68:2;	403, CM, I	Not relevant to
	83:5-22; 84:4-8		the original
85:24-86:3			designation
	35:20-37:13	I, 403, CM,	Not relevant to
		S, VA, LO,	the original
		LEGAL	designation; not
			relevant (DREs)
			under FRE 401;
			lack of
			foundation/specul
87:3-9			ation, FRE 602
	67:23-68:2;	I, 403, CM,	Not relevant to
	88:24-89-20	VA, LO	the original
			designation; not
			relevant (DREs)
89:21-24	a= aa aa a	T 100 T 0	under FRE 401
	67:23-68:2;	I, 403, LO,	Not relevant to
	88:24-89:20;	VA, CM,	the original
	90:4-6; 90:9	LEGAL,	designation; not
00.11.10			relevant (DREs)
90:11-16	07.00.00.0	T 400 T 0	under FRE 401
	67:23-68:2	I, 403, LO,	Not relevant to
00.17 01.19		LEGAL,	the original
90:17-91:13	07.00.00.0	ARG	designation
	67:23-68:2;	I, 403, LO,	Not relevant to
01.15 00	133:1-16	LEGAL,	the original
91:15-23		ARG	designation; not

			relevant (DREs)
			under FRE 401
	92:8-12; 92:16-	I, 403, LO,	Not relevant to
	22; 93:9-15;	LEGAL	the original
	133:1-16		designation; not
	100/1 10		relevant (DREs)
91:25-92:6			under FRE 401
	92:8-12; 92:16-	CM, I, 403,	Not relevant to
	22; 95:25-96:2;	LEGAL,	the original
	96:6-10; 133:1-	ARG	designation; not
	16		relevant (DREs)
93:9-22			under FRE 401
	93:9-17; 93:21-	CM, LO,	Not relevant to
	22; 94:9-95:6	LEGAL, I,	the original
93:24-94:7		ARG	designation
	94:9-11; 94:15-	I, LO	No objection to
	95:6	, -	94:9-11;
			Defendants object
			to the remaining
			counter-
			designations as
			speculation, FRE
			602; Defendants
			further object on
			the grounds that
			the excerpted
			testimony would
			be unfairly
			prejudicial,
			confusing,
			distracting, or a
			waste of time,
94:12-14			FRE 403
	99:13-18;	I, 403,	
95:7-14	99:22-23	LEGAL	
	124:6-125:9	I, 403, LO,	Hearsay FRE 801.
97:1-7		F, ARG, CM	
	97:8-14; 97:17-	I, LO,	FRE 602 – lack of
	98:9	LEGAL,	foundation,
		403, CM,	speculation
98:10-14		VA	_

	124:6-125:9;	I, LO,	Hearsay FRE 801
	134:7-19	LEGAL,	v
99:16-23		CM, ARG	
	77:2-77:6;	I, VA, LO,	
	99:13-18;	LEGAL,	
99:25-100:3	99:22-23	CM	
	133:1-16;	LO,	Hearsay FRE 801
	134:7-19	LEGAL, F,	
101:22-102:12		CM, ARG	
	133:1-16;	LO,	Hearsay FRE 801
	134:7-19	LEGAL, F,	
		CM, ARG,	
102:6-12		403	
102:22-25	102:14-21	I, LEGAL	
		VA, F, ARG,	
103:3-8		S	
	134:7-19	F, CM,	
103:10-25		ARG, VA, I	
	97:8-14; 107:6-	I, VA,	
	14; 107:18-	LEGAL	
107:15-17	108:5		
	97:8-14; 107:6-	I, CM, VA,	
108:2-5	108:1	LO, F	
	110:11-21;	I	
111:20-112:8	112:9-113:2		
	110:11-21;	I	
113:3-16	113:17-19		
125:10-16	124:6-125:9	I	

	Plaintiffs'	Plaintiffs'	Defendants'
Donna Price – March	Counter	Objections	Counter
8, 2022 Deposition	Designation		Designation
Designations			Objections
	19:11-20:2;	I, NR, VA	Objection on the
	20:11-16		grounds that the
			counter-
			designations from
			19:11-20:2 and
			20:11-16 are
20:17-21:3			irrelevant to the

			original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
22:6-14	22.10.24.2	D I O I	01:
	23:19-24:6	F, LO, I	Objection on the grounds that the counter-designation from 23:19-24:6 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time,
22:15-23:13	24.24.22.0	EIOI	F.R.E. 403.
27:9-15	24:24-26:9; 26:15- 27:5;27:17-19; 28:2-28:9	F, LO, I, ARG	Objection on the grounds that the counter-designations from 27:17-19 and 28:2-28:9 are irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object

			on the grounds
			that its reception
			_
			would be unfairly
			prejudicial,
			confusing,
			distracting, or a
			waste of time,
			F.R.E. 403.
	39:25-40:8	Ι	Objection on the
			grounds that the
			counter-
			designation from
			39:25-40:8 is
			irrelevant to the
			original
			designations.;
			Lack of relevance
			F.R.E. 401; Object
			on the grounds
			that its reception
			would be unfairly
			prejudicial,
			confusing,
			_
			distracting, or a
20.22.24			waste of time,
39:22-24	41 11 40 1	т	F.R.E. 403.
	41:11-42:1	Ι	Objection on the
			grounds that the
			counter-
			designation from
			41:11-42:1 is
			irrelevant to the
			original
			designations.;
			Lack of relevance
			F.R.E. 401; Object
			on the grounds
			that its reception
			would be unfairly
			prejudicial,
42:2-6			confusing,

			distracting, or a
			waste of time,
			F.R.E. 403.
	42:24-43:2;	I	Objection on the
	43:13-18		grounds that the
			counter-
			designation from
			43:13-18 is
			irrelevant to the
			original
			designations.;
			Lack of relevance
			F.R.E. 401; Object
			on the grounds
			that its reception
			would be unfairly
			prejudicial,
			confusing,
			distracting, or a
43:3-4			waste of time,
45.5-4	43:13-43-18	Ι	F.R.E. 403. Objection on the
	40.10-40-10	1	grounds that the
			counter-
			designation from
			43:13-18 is
			irrelevant to the
			original
			designations.;
			Lack of relevance
			F.R.E. 401; Object
			on the grounds
			that its reception
			would be unfairly
			prejudicial,
			confusing,
			distracting, or a
			waste of time,
43:5-7			F.R.E. 403.

	44:9-17; 44:25-	I, LEGAL	
45:23-46:7	45:21	,	
	44:9-17; 44:25-	I, LEGAL	
	45:21; 45:23-		
46:8-11	46:7		
	46:13-47:3	I, VA	Objection on the
			grounds that the
			counter-
			designation from
			46:13-47:3 is
			irrelevant to the
			original designations.;
			Lack of relevance
			F.R.E. 401; Object
			on the grounds
			that its reception
			would be unfairly
			prejudicial,
			confusing,
			distracting, or a
			waste of time,
47:6-14			F.R.E. 403.
	47:16-20; 48:1-	I, LEGAL	Objection on the
	48:7		grounds that the
			counter-
			designation from
			48:1-48:7 is
			irrelevant to the
			original designations.;
			Lack of relevance
			F.R.E. 401; Object
			on the grounds
			that its reception
			would be unfairly
			prejudicial,
			confusing,
			distracting, or a
			waste of time,
47:21-25			F.R.E. 403.

48:8-15	48:1-48:7	I, LEGAL	
48:23- 49:7	48:16-22	I, LO	
	48:15-20;	I, CM,	Objection on the
	48:22-24	ARG,	grounds that the
		LEGAL	counter-
			designations from
			48:15-20 and
			48:22-24 are
			irrelevant to the
			original
			designations.;
			Lack of relevance
			F.R.E. 401; Object
			on the grounds
			that its reception
			would be unfairly
			prejudicial,
			confusing,
			distracting, or a
			waste of time,
49:25-50:12			F.R.E. 403.
	44:9-14; 57:25-	LO, I, VA	
	58:10; 58:21-		
	59:5; 61:22-		
61:17-21	62:12		
	67:6; 67:11-13;	I, LO, VA,	
	67:17-21	LEGAL,	
67:7-10		ARG	
	69:16-18	I, LO, F,	
		VA, S,	
70:1-4		LEGAL	
	71:9-12; 71:17-	I, LO, F,	
	22	VA, S,	
		LEGAL	
71:23-72:6		I O D II	
		LO, F, H,	
		ARG,	
		LEGAL,	
86:4-90:24	100010	CM	
103:17-104-5	103:9-16	I, LO	

	104:20-105:2	I, LO,	
105:3-7		LEGAL	
	110:1-14;	I, LO	
	116:1-6;		
	116:12-117:6;		
117:13-20	117:21-23		
118:7-9		LO, LEGAL	

Jeffrey Schoenberg -	Plaintiffs'	Plaintiffs'	Defendants'
October 19, 2021	Counter	Objections	Counter
Deposition	Designation		Designation
Designations			Objections
10:8-9	10:7	I, NR	
32:20-33:7		NR	
	35:3-13	I, H	Counter-
			designation is not
			related to
35:14-36:17			designation
36:18-22		I, NR	
		H, LO,	
37:1-23		LEGAL	
38:12-39:8	37:24-38:11	ARG, F, I	
	54:8-11	I, H, F,	
54:15-55:3		LEGAL	
	49:12-13; 55:5-	S, VA, I	
55:12-24	8		
		LO, F, H,	
60:11-21		LEGAL, S	
61:7–8	60:22-61:2	I, VA	
	72:14-19	I, F, VA,	
72:22-73:2		LEGAL, LO	
73:4-9		F, H, LO, S	
73:10-14		F, H, LO, S	
76:22-77:14	76:18-21	I, ARG, LO	
	78:12-24	I, LO,	
79:1-10		LEGAL	
	79:12-17; 80:6-	LO,	
79:18-80:5	81:7	LEGAL, I	
81:20-82:1			

	83:16-24	I, LO,	
83:25-84:4		LEGAL	
	84:5	I, S, LO,	
84:6-18		LEGAL	
	84:5-85:10	I, VA	Counter-
			designation is not
			related to
85:11-16			designation
92:23-93:4	92:14-21	I	
	93:5-7	I, LO,	
93:8-19		LEGAL	
93:20-96:10			
96:11-16			
96:17-97:16			
	98:19-99:4	I, LO,	
99:5-24		LEGAL, VA	
		ARG,	
101:1-17		LEGAL, LO	
	102:25-103:2	I, LEGAL,	
103:4-104:1		ARG, LO	
	106:1-20	ARG,	
		LEGAL, S,	
104:16-105:17		I, LO	
108:7-13	107:24-108:6	I	
126:10-127:25	126:7-9	I, LEGAL	
132:9-16	132:17-133:3	I	
		H, F, COM,	
		S, LO,	
141:24-145:18		LEGAL	

Coalition for Good Governance - March 17, 2022 30(b)(6) Deposition Designations	Plaintiffs' Counter Designation	Plaintiffs' Objections	Defendants' Counter Designation Objections
48:4- 48:19			
48:20- 49:19			
51:8-51:15	53:1 - 54:25		
	55:7 - 55:17		Objection on the
52:17-54:1			grounds that the

		counter- designation from 55:7-17 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
58:13-18		
74:14-25 84:23-85:5	78:1 – 80:21	Objection on the grounds that the counter-designation from 78:1-80:21 is irrelevant to the original designations. Objection on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
	89:21- 90:15	Objection on the grounds that the counterdesignation from 89:21-90:15 is
86:13-21		irrelevant to the

		original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
87:17- 88:14		
92:8-94:12		
97:8-100:2	102: 4-19	Objection on the grounds that the counterdesignation from 102:4-19 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time,
101:3-22 103:25-104:3		F.R.E. 403.
103.25-104.3		
107:10-22		
112:25-113:13		
116:19-117:12		
117:23-118:3		
119:5-119:9		
119:10- 120:2		

199.0 199.14	128:15- 129:6		Objection on the grounds that the counterdesignation from 128:15-129:6 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time,
128:8-128:14			F.R.E. 403.
131:21-23			
131:24-132:25			
135:19-22			
136:24-137:13			
138:5-25			
142:7-10			
142:11-20			
142:21-144:14			
144:15-22			
154:13-155:4			
158:3- 159:23			
161:5-8			
162:25-163:16			
170:9-22			
171:4-171:22		NR	
174:21-174:23			
180:24-181:13			
181:22-182:6			
182:7-183:03			
183:20-184:16			
184:24-185:11			
187:13-18		<u> </u>	1

187:19-188:10		
191:8-19		
199:13-200:4		
206:4-206:12		
231:1-231:7		
231:8- 231:14	232:5 – 233:16	Objection on the grounds that the counterdesignation from 232:5-233:16 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.
234:14-235:09		111121 1991
239:8- 242:2		
243:2-9		
	247:16 – 248:6	Objection on the grounds that the counterdesignation from 247:16-248:6 is irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial,
246:3-246:8		confusing,

	distracting, or a
	waste of time,
	F.R.E. 403.

Laura Digges - September 23, 2021	Plaintiffs' Counter	Plaintiffs' Objections	Defendants' Counter
Deposition	Designation	0 mg 0 0 0 1 0 1 1 mg	Designation
Designations			Objections
11:18-23			
14:15-24			
14:25-16:21			
17:24-18:14			
18:4-14			
18:15-19			
24:15-26:23	24:6-14		
30:2-21			
31:6-15	31:9-18		
32:24-33:1			
33:2-11			
42:17-19			
46:17-49:13			
49:22-50:3			
50:8-24			
53:2-6			
53:17-24			

William Digges III - September 23, 2021	Plaintiffs' Counter	Plaintiffs' Objections	Defendants' Counter
Deposition	Designation		Designation
Designations	_		Objections
15:8-16			
17:8-22			
20:15-17			
20:5-14			
21:11-13			
21:14-16			
21:17-23			
21:20-22:10			
22:13-21			

23:6-10		
24:19-22	24:22-25:3	
25:15-26:2		
30:1-5		
30:1-8	30:18-31:12	
31:15-25		
34:2-5		
34:6-13		
34:23-24		
37:21-38:10		
38:25-39:2		
40:7-9		
42:3-9		
42:25-43:6		
46:1-11		
47:19-48:3		
48:4-12		
48:14-18		
48:21- 49:5		
49:11-50:1		
50:6-10		
50:24-51:17	51:18-52:17	
52:18-25		
53:1-6		
53:7-10		

Ricardo Davis -	Plaintiffs'	Plaintiffs'	Defendants'
September 29, 2021	Counter	Objections	Counter
Deposition	Designation		Designation
Designations			Objections
17:4-18			
17:13-18:20			
21:11-13			
22:11-26:5			
28:6 -22			
28:23-30:9			
30:17-32:18			
35:6-24			
39:6-21			

40:20-41:8		
41:16-42:9		
42:16-20		
42:21-43:5	43:17-43:23	
43:6-11	44:17-45:9	

Megan Missett - September 28, 2021 Deposition Designations	Plaintiffs' Counter Designation	Plaintiffs' Objections	Defendants' Counter Designation Objections
5:18-21			
15:19-20			
15:24-25			
16:22-25			
17:6-11	17:23-18:1		
18:14-18			
20:6-13			
20:19-22			
27:7-12	27:4-12		
32:20-33:6			
33:13-16			
34-38:2			
35:12-17			
35:18-22			
	36:1-17		Counter- designation is not related to
38:15-22			designation
40:12-17			
41:15- 42:19			
42:24-43:4			
43:9-13			
47:16-17			
48:16-18			
48:19-21			
49:8-9	50:2-23		
52:22-53:7	53:8-15		
54:13-17			
56:1-8	56:9		

57:13-18		
58:14-15		
59:10-12		
59:19-22		
60:2-5		
66:21-67:6		
67:2-6		
67:7-10		
67:22-68:2		
69:8-20		
70:14-18		
73:21-23		
77:3-9		

Philip Stark – December 16, 2022 Deposition Designations	Plaintiffs' Counter Designation	Plaintiffs' Objections	Defendants' Counter Designation Objections
14:16-22			
	15:6-11, 15:16-		
15:12-15	25, 16:19-17:7		
17:08-15			
19:9-20:06			
20:23-21:14	20:7-22		
23:18-21	23:22-24:1		
24:19-20			
26:20-03	26:25-27:3		
27:4-14			
27:17-25			
32:01-34:15			
36:12-19			
38:13-39:10			
39:11-19			
39:20-24	41:13-43:3	VA	
54:09-11			
54:23-55:1	54:15-54-23		
55:2-07			

Kevin Skoglund - December 16, 2022 Deposition Designations	Plaintiffs' Counter Designation	Plaintiffs' Objections	Defendants' Counter Designation Objections
18:3-5			
18:19-24			
22:4-7	22:2-3	NR, LEGAL	
28:24-29:1	28:1-2		Counter-designation is not related to designation
37:16-18	37:15		Counter-designation is incomplete
37:19-23			
37:8-14			
37:24-38:3			
38:4-7			
38:8-39:13			
41:23-42:2			
42:3-24			
43:2-8	43:9-11		
44:10-13	44:14-17		
44:24-45:2	45:3		
45:19-25	46:1		
55:25-56:2	56:3-11		Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.
64:23-66:8	66:12-18	VA	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.

79.0 19	79.07	77 A	
73:8-13	73:6-7	VA	
76:16-77:14	77:15-18		
84:5-17			
88:19-21	88:22-89:3		
104:4-11	103:19-104:3		
108:1-3			
110:1-20	110:21	VA	
111:10-23	111:9		
112:14-113:2		VA	
113:13-18			
114:11-12		IRR	
115:12-14			
			Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation.
119:2-14	119:15-16		F.R.E. 602.
110.2-11	121:17-19,		Objection on the grounds that the counter-designations from 121:20-122:12 are irrelevant to the original designations.; Lack of relevance F.R.E. 401; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time,
121:9-16	121:20-122:12		F.R.E. 403.